

1 IN THE UNITED STATES DISTRICT COURT

2 DISTRICT OF UTAH

3 CENTRAL DIVISION

4  
5 ALYSSA BISTLINE, et al., )

6 Plaintiffs, )

7 vs. ) Case No. 2:16-CV-788-TS

8 WARREN STEED JEFFS, et al., )

9 Defendants. )

10 \_\_\_\_\_)

11  
12 BEFORE THE HONORABLE TED STEWART

13 -----

14 September 27, 2022

15 Bench Trial

16 Volume II

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24 REPORTED BY: Patti Walker, CSR, RPR, CP 801-364-5440

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1 SALT LAKE CITY, UTAH; TUESDAY, SEPTEMBER 27, 2022; 8:30 A.M.

2 PROCEEDINGS

3 THE COURT: Good morning, counsel.

4 Mr. Hoole, are we ready?

5 MR. HOOLE: Yes, Your Honor.

6 THE COURT: Who are we calling first?

7 MR. HOOLE: I have a couple of preliminary things,  
8 if I may, just to let the Court know where we are.

9 THE COURT: Yes, go ahead.

10 MR. HOOLE: We had designated May Musser to  
11 testify by Zoom, but she is actually here today.

12 Amy Nielsen we designated to testify personally.  
13 She had a work conflict and has asked to join by Zoom. And  
14 I would actually just proffer her testimony in about ten  
15 minutes and have her respond to that, if that's okay with  
16 the Court.

17 THE COURT: Yes. That would be good.

18 MR. HOOLE: Other than that, we're ready to go and  
19 our first witness today would be Ruby Jessop.

20 RUBY JESSOP,

21 Having been duly sworn, was examined

22 and testified as follows:

23 THE CLERK: Would you state and spell your name,  
24 please.

25 THE WITNESS: Ruby Jessop. R-u-b-y, J-e-s-s-o-p.

1 DIRECT EXAMINATION

2 BY MR. HOOLE:

3 Q Ruby, were you born and raised in the FLDS?

4 A Yes.

5 Q At some point were you married?

6 A Yes.

7 Q Let me ask you some questions about the period before  
8 you were married, as you were growing up. What was your  
9 association with boys?

10 A Boys were considered snakes. We couldn't have any  
11 association with them.

12 Q Did you still have the natural feelings that a young  
13 girl would have toward boys?

14 A Yes.

15 Q Did you like a particular boy?

16 A Yes.

17 Q And who was that?

18 A Joseph Rohbock.

19 Q Joe Rohbock. Okay.

20 Did you try to associate with him?

21 A Yes. We talked on the phone secretly for about a year.

22 Q Okay. And was that found out by the FLDS?

23 A Yes.

24 Q What happened when that was found out?

25 A I was told that I was to be married on my birthday.

1 Q What is that date?

2 A May 3rd, 2001.

3 Q Was that also your birthday?

4 A Yes.

5 Q How old would you have been on that day?

6 A I would have been 15.

7 Q So you were told that you would have to marry on your  
8 birthday?

9 A Yes.

10 Q Where were you living at the time?

11 A At my Uncle Fred's home.

12 Q Was he actually your uncle?

13 A Yes.

14 Q Now we've heard testimony about people being referred  
15 to uncle, Uncle Rulon, Uncle Warren, that kind of thing. Is  
16 the word uncle used as a term of endearment in the FDLS?

17 A Endearment, respect, yeah.

18 Q So it doesn't always mean an actual uncle?

19 A Yes.

20 Q But in this case you were living with your Uncle Fred  
21 in his home?

22 A Yes.

23 Q Did you share a room with anybody?

24 A I did for a while, and then Uncle Fred arranged rooms  
25 and I was placed in my own room.

1 Q Was that unusual to have your own room?

2 A Yes, because I was a troublesome child.

3 Q You were considered a little bit of a rebel?

4 A Yes.

5 Q Because you liked a boy?

6 A Yes.

7 Q What happened with respect to you and having your own  
8 room that was unusual in your mind?

9 A Honestly, I didn't know what to really think about it.

10 Q Did you have any kind of visitors? Did anybody come  
11 help you fix things or take care of it?

12 A Every time something went wrong in my room -- I had my  
13 own bathroom -- Uncle Fred would send Haven, who was one of  
14 my stepbrothers, to come fix it.

15 Q Haven?

16 A Yes.

17 Q Haven Barlow?

18 A Yes.

19 Q Did you pick up any kind of a message from having him  
20 always be the one to come help you?

21 A I eventually got the thought that he was the one that I  
22 was supposed to marry.

23 Q Okay. And did you want to marry him?

24 A No.

25 Q Before your marriage, did you attempt to maybe go with

1 Joe Rohbock?

2 A Yes.

3 Q Would you explain that.

4 A The thought process, through my mind, was this is the  
5 guy I'm supposed to marry, and I don't want to. I want to  
6 be with Joe. I had called Joe -- he was in Salt Lake at the  
7 time -- and I asked him -- I pled with him please come get  
8 me. I don't want to go through this marriage. Let's just  
9 leave together, and he said I'm on my way.

10 Q And what did you do after you hung up the phone?

11 A I went into my room. I was starting to think about  
12 what I was going to take with me, and my brother walked in  
13 and said if he comes near you, I'm going to kill him.

14 Q Your brother said he would kill Joe?

15 A Yes.

16 Q And was that your brother Patrick?

17 A Yes.

18 THE COURT: Ms. Jessop, you were at this time 14  
19 years old?

20 THE WITNESS: Yes.

21 THE COURT: How old was Joe?

22 THE WITNESS: He was 18.

23 BY MR. HOOLE:

24 Q So there was a threat there. Did it appear to you that  
25 Patrick understood what you were doing, that you were



1 packing to leave?

2 A Yes.

3 Q What happened next?

4 A The phone rang. It was Joe. He says I am so sorry,  
5 but I can't come get you. My heart is with the priesthood.

6 Q And he didn't come?

7 A He didn't come.

8 Q Were you married on your 15th birthday?

9 A No.

10 Q Were you married before your 15th birthday?

11 A Yes.

12 Q Do you know why you were married so quickly, why your  
13 marriage was sped up?

14 A They found out I was trying to leave and they needed to  
15 get ahold of me.

16 Q Was there a pattern in the FLDS when a young girl seems  
17 to be a little bit rebellious to have them marry very early,  
18 have them get pregnant, and then lock them in?

19 A Yes.

20 Q Is that what happened to you?

21 A Yes.

22 Q What day were you married?

23 A April 23rd, 2001.

24 Q And where did that occur?

25 A Caliente, Nevada, in a hotel.

1 Q You were taken from where into Nevada? Where had you  
2 been?

3 A I was taken from Hildale, Utah to Caliente, Nevada.

4 Q Now you were 14?

5 A Yes.

6 Q Was it a legal marriage?

7 A No.

8 Q Who performed the marriage?

9 A Warren Jeffs.

10 Q Were there other marriages at Caliente, Nevada that  
11 day?

12 A Yes.

13 Q And did these occur in a motel owned by the church?

14 A Yes.

15 Q Who else was married that day?

16 A Elissa Wall.

17 Q Now Elissa Wall, was she also 14?

18 A Yes.

19 Q Wasn't she the complaining witness in the Utah  
20 prosecution of Warren Jeffs in the rape as an accomplice  
21 case?

22 A Yes.

23 Q And who is the other girl?

24 A My full older sister, Annie Jessop.

25 Q How old is she, if you know?

1 A Sixteen.

2 Q Do you know where she is today?

3 A I'm not a hundred percent where she's at.

4 Q Is she still in the group?

5 A As far as I know, yes.

6 Q Okay. After your marriage, what happened?

7 And I use the term marriage in sort of a general sense.

8 I understand it was a spiritual, religious marriage.

9 A We were taken back to Uncle Fred's home where the  
10 marriage was consummated.

11 Q Are you talking about the sexual relations?

12 A Yes.

13 Q And was that something that you wanted?

14 A No.

15 THE COURT: Who were you married to?

16 THE WITNESS: My stepbrother, second cousin, Haven  
17 Barlow.

18 THE COURT: How old was he?

19 THE WITNESS: He was 20.

20 BY MR. HOOLE:

21 Q And did he work for the police department?

22 A He was just starting to be on the fire department.

23 Q Okay. I think it was dispatch; is that right?

24 A Yes.

25 Q And did you consider that to be a rape?

1 A I'm sorry?

2 Q Did you consider that sexual contact to be a rape?

3 A Yes.

4 Q Did that continue?

5 A Yes.

6 Q What did you do about it, if anything?

7 A I left. I left the marriage. I left the church. Two  
8 weeks after I was married, I had called my brother, who is  
9 not there anymore.

10 Q He had already left?

11 A Yes.

12 Q Okay. So you called him.

13 A He was not able to come get me, but he sent his wife.  
14 I lived with them in Colorado City for a week.

15 Q At some point did you try to run away?

16 A That was -- that was the time that I ran.

17 Q Where did you go after -- did you go somewhere after  
18 being in your brother's home in Colorado City?

19 A My other brother Robert had taken me to Quail Lake on a  
20 day to go have fun.

21 Q And Quail Lake, is that a reservoir down close to  
22 Hurricane, Utah.

23 A Yes.

24 Q What happened at Quail Lake?

25 A I was swimming, and looked up and there was this

1 gentleman waving to me. And I finally realized it was Joe  
2 Rohbock. I went up, said hi. He asked if he could talk to  
3 me. We drove around St. George for two hours talking. He  
4 told me that he was sent down to come get me and bring me  
5 back, and if he could bring me back, then we could be  
6 married.

7 Q And who, if you understood, sent that message with Joe?

8 A Warren Jeffs.

9 Q And the message was if you went back to the group, you  
10 could marry Joe -- you would be married to Joe?

11 A Yes.

12 Q Which is what you had wanted?

13 A Yes.

14 Q Were you allowed to remarry Joe?

15 A No.

16 Q What happened next?

17 THE COURT: So you did return with Joe?

18 THE WITNESS: Yes.

19 BY MR. HOOLE:

20 Q So you relied on the statement that you would be  
21 allowed to be remarried if you went back to the community?

22 A Yes.

23 Q What happened next?

24 A Joe took me back to Uncle Fred's home. And I never  
25 found out he was kicked out, and I was told to gather

1 everything that I had, all my belongings, and I was taken to  
2 Canada.

3 Q Okay.

4 THE COURT: Who was kicked out?

5 THE WITNESS: Joseph.

6 BY MR. HOOLE:

7 Q Now who is Flora Jessop?

8 A Flora Jessop is my older sister.

9 Q Is she someone who has been an advocate for people  
10 leaving the group for maybe 30 years?

11 A Yes.

12 Q Did she find out about your marriage, do you know?

13 A I had called her when I called my brother, and told her  
14 that I had been married. She said that she was on her way  
15 to come pick me up, and she wasn't able to get here in time.

16 Q Where was she coming from?

17 A Phoenix.

18 Q Okay. Do you know if she did anything other than try  
19 to come get you?

20 A She did a missing person's report. Contacted CPS.  
21 Just kind of made a huge news story on it.

22 Q She took it public. She called DCFS, Child Protective  
23 Services. Did they start an investigation, to your  
24 knowledge?

25 A Yes.

1 Q Were they looking for you?

2 A Yes.

3 Q Is that why you were taken to Canada?

4 A As far as I know, yes.

5 Q Okay. And how long were you in Canada?

6 A I was there for two months.

7 Q In Canada, how were you feeling?

8 A Betrayed.

9 Q Did at some point you attempt to take your life?

10 A Yeah.

11 Q Did you come back from Canada to Colorado City or  
12 Hildale?

13 A Yes.

14 Q How did that happen?

15 A Willy Jessop, who was the bodyguard of Warren Jeffs,  
16 and Sam Roundy Junior, who is the chief of police there,  
17 escorted me back.

18 Q They came and got you?

19 A Yeah.

20 Q Had you been given a different name to use while you  
21 were in Canada?

22 A Yes.

23 Q What name was that?

24 A Ellen.

25 Q Do you know why you were given a different name and

1 told to use it?

2 A They didn't want anyone, outside of the knowledge of me  
3 being there, to know I was there.

4 Q So if somebody called DCFS, for example, and said we  
5 want to talk to Ruby Jessop, would they be able to say we  
6 don't have a Ruby Jessop here?

7 A Yes.

8 Q And that was accomplished by the fiction of giving you  
9 the name Ellen?

10 A Yes.

11 Q So you're in Canada, and Willy Jessop, who is part of  
12 church security, bodyguard for Warren Jeffs, and the chief  
13 of police from Colorado City, come and get you and they  
14 bring you back from Canada all the way to Short Creek?

15 A Yes.

16 Q And why did they do that?

17 A CPS had contacted Willy and wanted to talk to me. I  
18 had talked to them on the phone in Canada. And they said we  
19 don't know that this is Ruby, so we need to see her in  
20 person. So I was going down to speak to CPS.

21 Q Were you instructed as to what you should tell CPS or  
22 not tell CPS?

23 A Yes.

24 Q Who by?

25 A Willy Jessop.



1 Q What did he tell you?

2 A He told me that I needed to tell CPS that I was not  
3 raped, and that I am happy, and I didn't want to be bothered  
4 anymore.

5 Q Okay. So you said that you left the group when you  
6 went to your brother's house. That was not a successful  
7 escape?

8 A No.

9 Q How many years was it after your marriage that you were  
10 actually able to get out?

11 A Eleven.

12 Q During those 11 years, did you continue to have to live  
13 with Haven Barlow?

14 A Yes.

15 Q Did you have children?

16 A Yes.

17 Q How many children?

18 A Six.

19 Q Do you love your children?

20 A I absolutely do.

21 Q Were they, nevertheless, the product of rapes?

22 A Yes.

23 Can I take a break? I'm so sorry.

24 THE COURT: Yes.

25 MR. HOOLE: Your Honor, I wonder, while she's been

1     excused, whether we should call May Musser. I think her  
2     testimony would be quite brief.

3             THE COURT: That will be fine. Go ahead.

4                     MAY MUSSER,

5             Having been duly sworn, was examined

6             and testified as follows:

7             THE CLERK: Please state and spell your name.

8             THE WITNESS: May Musser. M-a-y, M-u-s-s-e-r.

9                     DIRECT EXAMINATION

10     BY MR. HOOLE:

11     Q     Good morning, May. How are you?

12     A     Good.

13     Q     Thank you for coming today.

14             May, were you born and raised in the FLDS church?

15     A     Yes.

16     Q     Have you had an opportunity to review the common  
17     allegations of fact that are contained in the complaint in  
18     this case?

19     A     Yes.

20     Q     Do you agree or disagree with those?

21     A     I agree.

22     Q     Have you also been able to read your specific  
23     allegations with respect to the facts applied to you  
24     specifically?

25     A     Yes.

1 THE COURT: Ms. Musser, will you speak directly  
2 into the microphone. You are soft-spoken.

3 THE WITNESS: Yes.

4 BY MR. HOOLE:

5 Q And are those accurate?

6 A Yes.

7 Q May, I want to call your attention to -- well, let me  
8 ask you this. When you were in the FLDS, before you left,  
9 did you believe that Warren Jeffs was the prophet?

10 A Yes.

11 Q Did you do what he asked you to do?

12 A Yes.

13 Q And was he able, in his position as the prophet, to  
14 control your life?

15 A 100 percent.

16 Q Where you lived?

17 A Yes.

18 Q Who you lived with?

19 A Yes.

20 Q Who you married?

21 A Yes.

22 Q What you ate?

23 A Yes.

24 Q What you wore?

25 A Yes.

1 Q Were you able to get information from the outside  
2 world?

3 A No.

4 Q What information did you have?

5 A Whatever they told us.

6 Q Okay. And things in the FLDS that affect the people,  
7 do those things happen without Warren Jeffs' consent or  
8 direction?

9 A No.

10 Q So he alone, under the one man rule doctrine,  
11 controlled all aspects of your life?

12 A Yes.

13 Q Were you concerned as a young girl that you would be  
14 placed in a marriage?

15 A Yes, eventually.

16 Q Were you required as a young girl to work for the  
17 church or church owned businesses?

18 A Yes.

19 Q Tell me about your work history.

20 A My older sister, Connie Musser, was employed at the  
21 Health Service Center, which was a birthing center out in  
22 Hildale. And there came a point where I believe she got  
23 sick, and basically they wanted someone to continue work and  
24 bring in money under her name, and so they had me illegally  
25 work under her name.

1 Q So you worked under her name?

2 A Yes.

3 Q Did you receive paychecks?

4 A No.

5 Q Do you know if any paychecks were ever written?

6 A Yes.

7 Q Were they written in your name or hers?

8 A Hers.

9 Q Do you know why did that?

10 A Because I was underage and it was illegal for me to be  
11 working.

12 Q Okay. What kind of work did you do there?

13 A Anything from overseeing patient charts to cleaning  
14 bedrooms, to feeding mothers who had just had their  
15 children, to stocking medical supplies, personal assistant  
16 type things, and actually helping oversee the distribution  
17 of checks to other employees.

18 Q And what age were you when you started to work there?

19 A I believe I was 13.

20 Q And was it part-time or full-time?

21 A It was a full-time job. I was pulled out of school --  
22 home schooling and sent to work every day from 8:00 a.m. to  
23 5:00 p.m.

24 Q What grade did you complete?

25 A Realistically, probably the fourth grade.

1 Q The fourth grade?

2 A Yes.

3 Q After you left, did you continue your education?

4 A Yes. I enrolled in high school.

5 Q Excuse me?

6 A I enrolled in high school.

7 Q Did you graduate from high school?

8 A Yes, I did.

9 Q Did you go on to college?

10 A Yes.

11 Q Where are you now? Are you still in college?

12 A Yes. I'm in my senior year.

13 Q Okay. Where do you go?

14 A To Utah Valley University.

15 Q How many years did you work at the birth center?

16 A From the time I was 13 until I was 15.

17 Q Eighteen?

18 A Fifteen.

19 Q Fifteen. Where did you work after that?

20 A I was pulled out of work and sent to be alone because I  
21 was not a good --

22 Q I'm sorry?

23 A I was sent to be alone in a repentance house after  
24 that. So I was no longer required or allowed to work.

25 Q You were required to be alone?

1 A Yes.

2 Q Was this some kind of discipline?

3 A Yes.

4 Q Had you done something wrong?

5 A No. I mean according to them, yes, but no.

6 Q Were you trying to be obedient?

7 A Yes.

8 Q Did you still believe Warren Jeffs was the prophet?

9 A At that point I had doubts, but I still wanted to  
10 believe.

11 Q Did everybody in the community believe?

12 A Yes.

13 Q If anybody had doubts, would they share them with  
14 anybody?

15 A No. You didn't share that. You would be sent to  
16 repent.

17 Q Did you ever share your doubts?

18 A With my sister Vileat, yes.

19 Q Okay. Was Vileat also thinking about leaving?

20 A Yes.

21 Q At some point did you?

22 A Yes.

23 Q And where did you go?

24 A I went to my half brother Brigham's house in Ivins,  
25 Utah.

1 Q And how old were you when you left?

2 A 16.

3 Q Did you tell anybody other than Vileat that you were  
4 going to go?

5 A No.

6 Q Did she go with you?

7 A Yes.

8 Q How did you get out?

9 A We initially contacted our biological father, David  
10 Musser.

11 Q Had he already been kicked out?

12 A He had been kicked out due to allegations of whatever.  
13 They never tell us what you're accused of. And we were  
14 initially going to live with him in Cedar, Utah, but in the  
15 meantime we traveled to Ivins, Utah.

16 We secretly packed bags in black trash bags and put  
17 them under wheelbarrels outside of the house. We scheduled  
18 an appointment to the eye doctor in St. George, Utah,  
19 because the only way that you're allowed to leave the  
20 community is if you have a legitimate medical reason, or  
21 other things of that nature. And so we used that as cover  
22 to leave the community.

23 And on the morning of that appointment, we took the  
24 trash bags out from under the wheelbarrel and took them to  
25 the park across town, and had our sister Connie, who had



1 previously left -- ironically the sister I worked under her  
2 name -- she had previously left the community and we asked  
3 her to come and get us. She was also living with Brigham at  
4 the time. So she came out and got us early that morning  
5 while we were supposedly at an eye doctor's appointment.

6 Q Was your escape discovered?

7 A Yes.

8 Q Tell us about that.

9 A When we did not return home that evening, my mother  
10 knew that something was wrong and had been trying to contact  
11 Vileat. Vileat is a married woman, had a phone. So they  
12 were trying to contact her. And we just kept ignoring the  
13 phone calls.

14 Eventually they called the police and said that I had  
15 run away, and that they knew where I was, but they couldn't  
16 get ahold of me. So they sent the Ivins Police Department  
17 over to Brigham's house.

18 Q And did you talk to the police?

19 A Yes.

20 Q And what was that exchange?

21 A They asked if I was safe, if I knew that my family was  
22 trying to contact me, things of that nature. And I told  
23 them that I was aware and I didn't want to be there, and  
24 that I had run away because I didn't feel safe at home.

25 Q Nevertheless, did the police make you go back?

1 A Yes. Later that evening, a second attempt, the police  
2 showed up with my mother and my brother Rulon and said I was  
3 required to either go home with my mother or go over to the  
4 Child Protective Service center in handcuffs, and then my  
5 mother would then pick me up from there.

6 Q And what happened?

7 A A big fight ensued verbally between me and my mother  
8 and my brother. And eventually I told my sister-in-law,  
9 Rachel, Brigham's wife, that I was going to go back home to  
10 Colorado City. I gave her my birth certificate and the few  
11 little documents that I had stolen from my mom's thing, and  
12 told her where I was going to be and for her to follow us  
13 back home and just pick me up again. But to just kind of  
14 end it and stop everybody fighting, I would go back for a  
15 minute.

16 Q Did you get in your mother's car?

17 A Yes.

18 Q Did you proceed back toward the community?

19 A Yes.

20 Q What happened in the car?

21 A We stopped at a Smith's parking lot. My brother Rulon  
22 asked if I needed anything. Their pattern was that if you  
23 were running away, they wanted to start spoiling you, and  
24 asked if I needed any, you know, goodies or anything like  
25 that. I told him I was fine. Then my mother was on the

1 phone with Lyle Jeffs, Warren's brother, and informed me  
2 that he wanted to speak to me.

3 Q Okay. And did you speak with Lyle Jeffs?

4 A Yes. He asked if I believed that Warren Jeffs was the  
5 true prophet. I answered no. He asked if I understood that  
6 my soul would be damned to hell if I answered that way, and  
7 I said yes.

8 Q Was it worth it for you to get out?

9 A Yes.

10 Q Did you think you were going to be damned to hell?

11 A At that time, yes.

12 Q In the community, girls like you that are a little  
13 rebellious -- fair to say?

14 A Yes.

15 Q -- do they get married early --

16 A Yes.

17 Q -- and have children and get stuck?

18 A Yes.

19 Q So it really is hard to get out with children?

20 A Yes.

21 Q Hard enough when you're by yourself?

22 A Yes.

23 THE COURT: Once again, this effort to run away is  
24 when you were 16?

25 THE WITNESS: Yes.

1 BY MR. HOOLE:

2 Q And why did you need to get out?

3 A Because I knew that because I was rebellious and I had  
4 seen what had happened to other girls with my same  
5 disposition, that eventually I would be married and that I  
6 could never get out. The women who -- or the girls that got  
7 married had children, and it was near impossible for them to  
8 leave.

9 Q Okay. So you left to avoid that?

10 A Yes.

11 Q When you were in the community, though, did you do  
12 everything you were asked to do by Warren Jeffs?

13 A Yes.

14 Q Did you believe that you needed to do that? Did you  
15 believe that you needed to do what he said?

16 A Yes.

17 Q Were you ever made aware that he had acknowledged to  
18 his little brother Nephi on a video recorded jail visit that  
19 he was not the prophet? Were you ever told that?

20 A Yes. I remember in the midst of that trial and those  
21 proceedings, the very few, I guess, times we were exposed to  
22 the media and the news, and things like that, whether it was  
23 because we heard it on the radio or we saw it in St. George,  
24 Utah at a doctor's office, that anything that they were  
25 portraying on there was lies and it was made up by the media

1 in an effort to destroy the priesthood and the prophet, and  
2 that Warren Jeffs telling me that was untrue and made up by  
3 the media.

4 Q And did you believe it was made up by the media?

5 A Yes.

6 Q So if you had been allowed to believe that, in other  
7 words if they had said, well, that's what he did, would that  
8 have changed your view of things?

9 A Yes, I think so.

10 Q Would you have been able to get out more quickly?

11 A Yes and no. It's kind of hard to say that I would  
12 immediately just have a realization that, oh, I can leave  
13 now. There's still so many other factors, such as family.

14 Q It's a process, isn't it?

15 A Yes.

16 Q You just don't make your mind up in one day?

17 A Yes.

18 Q Even after you left, did you have doubts about leaving?

19 A Yes.

20 Q How long did it take before those doubts finally went  
21 away and you were able to kind of clear your mind, you know,  
22 of that residue?

23 A I think -- I want to say probably six months before the  
24 veil completely shattered and I realized actually how  
25 horrible everything had been and the things that I had been

1 told were simply made up by the media or things just to  
2 slander the prophet, realizing that those were true really  
3 broke me.

4 Q Based on the information you have today, do you believe  
5 he was ever the prophet?

6 A No.

7 Q And, nevertheless, you worked for no pay. Was that in  
8 his service?

9 A Yes. It was to obey and to further the work.

10 Q For his benefit?

11 A Yes.

12 Q And it was not lawful because you had to use your  
13 sister's name?

14 A Yeah.

15 Q Would you have made different decisions if you had been  
16 told the truth while you were still part of the group?

17 A Yes.

18 Q Okay.

19 THE COURT: Do you have any idea how many hours  
20 you would have worked without having been compensated?

21 THE WITNESS: I don't know the exact amount. I do  
22 know that it was for 7.25 an hour. And Monday through  
23 Friday I would go to work at 8:00 a.m. The official day  
24 ended at 5:00 p.m., but I often left as late at 6:00 or 7:00  
25 p.m.

1 BY MR. HOOLE:

2 Q And that was from age 13 to 18?

3 A To 15.

4 Q To 15. Excuse me.

5 Okay. I think we can do the calculation based on that.

6 MR. HOOLE: Your Honor, I don't have anything else  
7 from me. Thank you.

8 THE COURT: Thank you.

9 MR. HOOLE: I would recall Ruby Jessop, if Ruby is  
10 ready.

11 DIRECT EXAMINATION (Continued)

12 BY MR. HOOLE:

13 Q Are you okay?

14 A Yeah, for now.

15 Q If you need to take a break, we understand. We can  
16 fill in with other witnesses.

17 Ruby, you testified it was 11 years after you first  
18 tried to get out that you were actually successful in  
19 getting out. During that time, did you believe Warren Jeffs  
20 was the prophet?

21 A Yes and no. I had my doubts.

22 Q Okay. Nevertheless, did you do what he commanded you  
23 to do?

24 A Yes.

25 Q Including staying in this unlawful marriage?

1 A Yes.

2 Q Having children?

3 A Yes.

4 THE COURT: Were you ever legally married?

5 THE WITNESS: Yes.

6 BY MR. HOOLE:

7 Q Tell us about that.

8 A A year after being brought back from Canada, I was told  
9 that there was a lot of media and I needed to be legally  
10 married to stop the media from attacking us, I guess.

11 Q Were you already pregnant?

12 A Yes.

13 Q How old were you when you were legally married?

14 A I had just turned 16.

15 Q Okay. Was that in Utah?

16 A Yes.

17 Q With parental consent?

18 A Yes. Walter Steed was the judge.

19 Q He was an FLDS justice of the peace in Short Creek?

20 A Yes.

21 Q And then later was removed from his position. Do you  
22 know that?

23 A Yes.

24 Q Are you aware that he also drove his truck off a cliff  
25 and killed himself?



1 A Yes.

2 Q Are you aware of a lot of suicides from the community?

3 A Quite a few.

4 Q And you thought about it yourself?

5 A Sad to say, yes.

6 Q During that period of 11 years when you believed he was  
7 the prophet but had your doubts, did you, nevertheless, work  
8 to build up the program he wanted you to build up?

9 A Yes.

10 Q And you benefited him with your labor and services?

11 I'm talking about Warren Jeffs.

12 A Yes.

13 Q Okay. What kinds of work did you do during that period  
14 of time?

15 A I did sewing, cleaned houses. At one point I was sent  
16 to California to cook and clean for a group of men that was  
17 taking down homes.

18 Q It was a work crew you were taking care of?

19 A Yes.

20 Q Okay. What kind of work did you do there?

21 A Cooked, cleaned, laundry, mending.

22 Q How many men?

23 A There was about 15, 15 to 20.

24 Q Were you paid for that?

25 A No.

1 Q Were you paid for sewing?

2 A No.

3 Q And what kinds of items did you make?

4 A Shirts, dresses, maxi pads, bras.

5 Q LDS approved items?

6 A Yes.

7 Q I might have said LDS. I meant FLDS approved items?

8 A Yes.

9 Q Thank you.

10 Did you ever clean homes?

11 A Yes. The bishop at the time, William Jessop, had  
12 called me in and told me that I needed to get a crew and  
13 clean homes to build Zion.

14 Q And where did you clean homes?

15 A In Hildale, Utah, Colorado City.

16 Q In both states?

17 A Yes.

18 Q And that was at the direction of the then bishop,  
19 William E. Timpson?

20 A Yes.

21 Q And was that for the benefit of Warren Jeffs?

22 A Yes.

23 Q Okay. If you had not done this work, what would have  
24 happened to you, if you had refused? Any of the work from  
25 cleaning homes to taking care of work crews in California to

1 sewing for the storehouse, if you had said I'm just not  
2 doing that, what would have happened?

3 A I wouldn't be able to talk to my mother. I would  
4 probably be kicked out, having my kids taken from me.

5 Q Were you worried about having your kids taken from you?

6 A Yeah, a little bit. I think all of us were.

7 Q Did you ever teach school?

8 A Yes, I did.

9 Q Now tell me again, when did you stop going to school?

10 A I stopped going to school after eighth grade.

11 Q To get married?

12 A Yes.

13 Q And then you went back and taught school?

14 A Yes.

15 Q And was this an FLDS curriculum?

16 A Yes.

17 Q And who were you teaching?

18 A Second grade.

19 Q Can you give me an example of the kinds of things you  
20 would teach?

21 A A lot of it was based off of the FLDS teachings. We  
22 would have pictures of Warren Jeffs in the corner of every  
23 desk. We had no idea who the president of the United States  
24 was. To us it was Warren Jeffs, or the prophet at the time.

25 Q Were the children taught that Warren Jeffs was

1 essentially the president of the United States?

2 A Yes.

3 Q Okay. It was a church based curriculum?

4 A Yes.

5 Q Did it prepare those children for living in the outside  
6 world?

7 A No.

8 Q Did their education make them, in fact, more dependent  
9 on staying inside the group?

10 A Yes.

11 Q Were you paid for working -- were you paid for your  
12 teaching?

13 A No.

14 Q And was that for the benefit of Warren Jeffs as well?

15 A Yes.

16 Q Would there have been serious harm to you or your  
17 family members if you had not done that?

18 A Yes.

19 Q I understand that there was a raid in Texas. When I  
20 say raid, I really mean search warrants were executed by law  
21 enforcement on the YFZ, Yearning For Zion, ranch in El  
22 Dorado, Texas. Were you aware of that?

23 A Yes.

24 Q Did you ever go to Texas?

25 A Yes. I was told Haven was called by William Jessop and

1 told that Warren wanted me to go and testify.

2 Q Okay. And you went down there?

3 A Yes.

4 Q Were you able to testify?

5 A No.

6 Q Do you know why?

7 A My story was just out of this world. They couldn't use  
8 my story. I was a 14-year-old girl that got married. They  
9 didn't want that to be, I guess, a scene.

10 Q They didn't want to prove that? That was not part of  
11 what they wanted to prove?

12 A No.

13 Q Were you aware whether children had been taken from  
14 their parents and taken to Texas before?

15 A I wasn't aware of it.

16 Q When you got there did you realize that the children  
17 that were there were often not with their parents?

18 A When I got there, yes.

19 Q Okay. And was there an effort, to your knowledge, to  
20 bring mothers to Texas so they could claim that the state  
21 had taken their children away?

22 A I didn't know of that. I was just told to go and  
23 testify.

24 Q Okay. But, in fact, if that happened, the mothers had  
25 already lost their children to the church?

1 A Yes.

2 Q What happened after Texas?

3 A I had gone back to Hildale, Utah. I was actually  
4 pregnant with my fourth child. I had gone back there and  
5 remained there for several years.

6 Q At some point did you try to escape again?

7 A Yes.

8 Q When was that?

9 A In the end of 2012.

10 Q And what did you try to do?

11 A I left with a friend who was born and raised in Canada.  
12 I left my children. I needed to get financially set for me  
13 to take care of my children. So I left with her. We went  
14 to -- I was going to go with her to Canada and be with her  
15 for a little while, and got to the border, realized that my  
16 birth certificate had been taken out of my bag.

17 Q Why did you need that?

18 A To cross the border.

19 Q Okay.

20 A I had called Haven and asked him where my birth  
21 certificate was. He said I took it out. I told him I need  
22 that. He met me in Idaho where he told me that he would  
23 only give it to me if I signed my children over to the  
24 church.

25 Q What did you do?

1 A I felt so trapped. I had to -- I had to get out for  
2 me. I met him at a notary office and signed the papers.

3 Q Did you think they were legally binding, or did you  
4 know?

5 A Yes, I did.

6 Q Why did you sign over your children?

7 A If I wasn't safe for me, I couldn't be safe for my  
8 children.

9 Q So you knew you had to get yourself out and stabilized  
10 before you could go get them?

11 A Yes.

12 Q How many children did you have at this point?

13 A Six.

14 Q Flashing forward for a minute, were you eventually able  
15 to get all of your children?

16 A Yes.

17 Q Have you been able to raise them since then?

18 A Yes.

19 Q So it worked. Okay.

20 A Eventually.

21 Q Okay. Now let me call your attention to a lawsuit  
22 brought in Phoenix, Arizona by the United States Department  
23 of Justice. Are you familiar with that?

24 A Yes.

25 Q And that case was against Hildale City, Colorado City,

1 some of the entities there, including the marshal's office?

2 A Yes.

3 Q The marshal's office is what we'd call the police  
4 department, right?

5 A Yes.

6 Q It's just an Arizona term?

7 A Yes.

8 Q And you testified that the chief of police, Sam Roundy  
9 Junior, had gone all the way to Canada to bring you back  
10 into the marriage. Is that accurate?

11 A Yes.

12 Q And he was assisted by Willy Jessop who was part of  
13 church security?

14 A Yes.

15 Q And Warren Jeffs' bodyguard?

16 A Yes.

17 Q Did the police and the church security work together?

18 A Yes.

19 Q And was that to enforce Warren Jeffs' desires?

20 A Yes.

21 Q And did you end up giving a deposition in that case?

22 A Yes.

23 Q Okay. Was that before or after you were able to get  
24 out.

25 A It was after I was able to get out.



1 Q And what was the date you were actually able to get  
2 out?

3 A I was -- I don't remember the exact day, but it was in  
4 December of 2012.

5 Q At that point did you believe Warren Jeffs was the  
6 prophet?

7 A No.

8 Q How long did it take you during that 11 years to come  
9 to that conclusion, if you know?

10 A I'm not even a hundred percent on that.

11 Q Was it a long process?

12 A Not really a long process. I kind of just faked it so  
13 I could be with my family. I was very close to my mom and I  
14 was the one that was kind of just taking care of her and --

15 Q Let me ask you some questions about your mother.  
16 What's her name?

17 A Patricia.

18 Q Were you able to speak with her?

19 When was the last time you were able to speak with her  
20 on the phone?

21 A I had gotten her phone number from a family friend, and  
22 I had contacted her about two years ago.

23 Q And was it her birthday?

24 A Yes.

25 Q Were you able to reach your mother?

1 A Yes. She answered the phone.

2 Q How long had it been since you had spoken with her?

3 A About eight, ten years.

4 Q Okay. What happened during that call?

5 A We talked. I told her that her little girl needs her.

6 At the end of the phone call she said I love you. And there  
7 was someone in the background that said we're going to have  
8 to change your number, and the phone went dead.

9 Q You heard somebody in the background say we're going to  
10 have to change your number?

11 A Yeah.

12 Q Were they talking to you?

13 A No. They were talking to my mother.

14 Q So because you had the phone number of your mother,  
15 they were going to have to change her number?

16 A Yes.

17 Q Did you try to reach her again?

18 A She contacted me --

19 Q Okay.

20 A -- about a day, maybe two days later.

21 Q Were you able to talk to her?

22 A Yes.

23 Q Have you been able to talk to her since?

24 A No.

25 THE COURT: Where is your mother living at this

1 time?

2 THE WITNESS: I'm not a hundred percent. They  
3 moved her around so much. I kind of got the impression that  
4 she was in Colorado, but I'm not a hundred percent.

5 BY MR. HOOLE:

6 Q Colorado as opposed to Colorado City?

7 A Yes.

8 Q Okay. What's the one thing you want out of this case?

9 A I want my mom to see her children. I want my mom to  
10 see her grandchildren.

11 Q In the personal allegations that you included in the  
12 complaint, it says that Ruby Jessop has endured rape, abuse,  
13 kidnapping, torture, and the types of extreme emotional  
14 distress no person, especially a child, should endure, and  
15 in the end, only through heroic efforts and determination  
16 was she able to escape the FLDS church and rejoin her  
17 children. Do you agree with that?

18 A Yes.

19 MR. HOOLE: Your Honor, in terms of damages, Ruby  
20 was taking care of six children and so she did not work a  
21 lot outside of the home. Our disclosures reference an  
22 estimate of \$3,000 in lost economic damages for the work she  
23 did that she wasn't paid for.

24 THE COURT: That seems very modest considering her  
25 testimony here today about the California work crew,

1 teaching school, et cetera, et cetera.

2 MR. HOOLE: I think it is modest.

3 BY MR. HOOLE:

4 Q But you were in California teaching school for only a  
5 couple of months, right?

6 A No. It was in Colorado City that I was teaching  
7 school.

8 THE COURT: You were working as the maid for the  
9 work crew in California.

10 BY MR. HOOLE:

11 Q That was a couple of months, wasn't it?

12 A That was two months.

13 Q So tell us if we're low on that estimate. That was a  
14 conservative estimate. But what would you estimate you  
15 would have been paid, even at minimum wage, for the hours  
16 you spent in all of your service to Warren Jeffs?

17 A I don't -- I can't even put an amount on that. I did  
18 it to sacrifice myself to be able to take care of my mother.  
19 In order to do that, I had to do as I was told.

20 Q Would it be more or less than \$10,000?

21 A Ten thousand sounds okay.

22 Q You're comfortable estimating that loss at 10,000?

23 A Yeah.

24 Q Okay.

25 THE COURT: What I would like to know, if you can,

1 is an estimate as to the number of hours you would have  
2 worked without being paid. Do you have an ability to  
3 estimate that?

4 THE WITNESS: I would have to say at least three  
5 to five years with the sewing, with the --

6 THE COURT: Three to five years of full-time,  
7 eight-hour-a-day type work?

8 THE WITNESS: Yes.

9 MR. HOOLE: Your Honor, I think I can calculate  
10 maybe an average of four years, if it's three to five. I  
11 think I can do four years at full-time at minimum wage,  
12 unless the Court has other questions.

13 THE COURT: I don't, counsel. Thank you.

14 MR. HOOLE: Okay.

15 I think that's all I've got. May she be excused?

16 THE COURT: She may.

17 THE WITNESS: Thank you.

18 MR. HOOLE: Plaintiffs will call Susan Broadbent.

19 She stepped out. Why don't we go with Gina  
20 Rohbock.

21 GINA ROHBOCK,

22 Having been duly sworn, was examined

23 and testified as follows:

24 THE CLERK: Would you please state and spell your  
25 name.

1 THE WITNESS: Gina Rohbock. G-i-n-a,  
2 R-o-h-b-o-c-k.

3 DIRECT EXAMINATION

4 BY MR. HOOLE:

5 Q Good morning, Gina.

6 A Good morning.

7 Q Were you born and raised in the FLDS?

8 A Yes.

9 Q And did you get a chance to review those common  
10 allegations?

11 A Yes, I did.

12 Q And did you review the specific allegations relating to  
13 you?

14 A Yes, I did.

15 Q Do you agree that they're accurate?

16 A Yes.

17 Q Is there anything you would want to change?

18 A No.

19 Q Gina, were you born and raised in the FLDS?

20 A Yes, I was.

21 Q Did there come a time that you were married?

22 A Yes.

23 Q How old were you when you were married?

24 A Sixteen.

25 Q How did that come about?

1       A       When I was 15, Warren had took over his father -- his  
2       father had a stroke a few years before that. Warren had  
3       took over. And my father came to me and asked me if I  
4       wanted to go with him, because my father was over the school  
5       board -- the public school board at that time and also over  
6       the power and water plant at that time. He was president of  
7       those two foundations. And he asked me if I wanted to go  
8       with him to meet Warren because I had never met him.

9               And I went in, and Father and Warren had a  
10      conversation, and Warren turned to me, and he looked me up  
11      and down, and he said, well, who is this young lady. And  
12      father told him this is my daughter Gina. Warren asked my  
13      father is she obedient, and he said yes. And they kind of  
14      discussed me. And Warren pulled out his little black  
15      book -- we liked to call it. It was where he put his names  
16      in when fathers gave their daughters over to the priesthood.  
17      And my father looked at Warren and said no. He went what?  
18      And he said she doesn't even have her driver's license yet.

19             And Warren looked at my dad and kind of gave him this  
20      look, like he was kind of surprised. And he said, Lee, you  
21      bring your daughter in as soon as she gets her driver's  
22      license. My dad had no intention of bringing me when I got  
23      my driver's license.

24             I got my driver's license in November after I turned  
25      16. And my father had a phone call two weeks later from

1 Warren, and he said why haven't you brought your daughter in  
2 yet? She has her driver's license. My father thought I had  
3 called Warren and told him. And he came and asked me and I  
4 said no. And he said, oh, he must have been inspired, but I  
5 have to take you and turn you in.

6 Q So did your father take you to turn you in to the  
7 prophet?

8 A He did.

9 Q What does that mean to turn you in?

10 A That means you're giving your daughter over to the  
11 priesthood so they can decide what happens to your daughter.

12 Q In terms of marriage?

13 A Marriage, what they're going to do in their future.

14 Q Okay. And were you told anything about marriage at  
15 this point?

16 A Yes. My family was the wicked family in the town, to  
17 put it lightly, because my father was not born in the FLDS.  
18 So he told my mothers to make sure that we were educated.

19 Q So he was not part of the FLDS?

20 A No. He joined when -- his father joined when he was  
21 16, and all of his family left besides him.

22 Q So he had had some experience in the outside world  
23 before he became part of the FLDS?

24 A Yes. He was angry. They were LDS and they transferred  
25 over to the FLDS. And at 16 years old, he was angry because



1 they lived up here in Salt Lake and they moved down -- he  
2 called it Shit Creek at the time. Sorry.

3 He was very angry that he had to leave Salt Lake and  
4 move down to this more strict --

5 Q Were you a little --

6 THE COURT: Excuse me, Mr. Hoole. Why was your  
7 father allowed to hold those positions of responsibility if  
8 he was not a member of the FLDS church?

9 THE WITNESS: Oh, he did become an elder when he  
10 was 16. His father became an elder, and then he became a  
11 part of the FLDS at 16 years old.

12 THE COURT: Your father did?

13 THE WITNESS: My father did.

14 BY MR. HOOLE:

15 Q But your grandfather, his family joined, and at that  
16 time your father was only 16?

17 A Yes.

18 Q But he had 16 years of experience outside of the FLDS?

19 A Yes.

20 Q You're saying he was a little -- maybe a little bit  
21 rebellious because of that?

22 A Yes.

23 Q Was he eventually kicked out?

24 A When I got married -- when we finally went and turned  
25 me in, and Warren was writing down -- I had actually asked

1 for a person, a man, that I didn't marry. And Warren -- my  
2 father looked at Warren and said the only thing I will not  
3 allow is her marrying somebody that she is related to.

4 Q I didn't hear that. I'm sorry.

5 A He said the only thing that I will not allow -- my  
6 father said to Warren -- is that she marries somebody that  
7 she's related to.

8 Q Okay. So there was an incest concern?

9 A Yes. That was a common thing at the time. There was  
10 some uncles that had married their nieces. Warren looked at  
11 father, gave him that weird look and said, Lee, if we could  
12 believe in the laws of the Lord and not the laws of the man,  
13 fathers would marry their daughters and brothers would marry  
14 their sisters. And father said, well, we still believe in  
15 the laws of the land.

16 Q That's pretty remarkable for him to say that?

17 A My father was very strong willed. He was a very --

18 THE COURT: Was he allowed to be rebellious  
19 because he was --

20 THE WITNESS: Held those positions.

21 THE COURT: Held those positions.

22 THE WITNESS: After I got married, he was kicked  
23 out two and a half years later.

24 BY MR. HOOLE:

25 Q So you were 16 when you got married?

1 A Uh-huh. (Affirmative)

2 THE COURT: Yesterday we had testimony that within  
3 the FLDS, if a young woman said that she wanted to marry a  
4 person, that she might be given that opportunity. It was  
5 just the men who were not allowed to decide who they were to  
6 marry. It was subject to their priesthood leadership.

7 THE WITNESS: Very true.

8 THE COURT: Did I understand you to say a moment  
9 ago that you indicated to Warren Jeffs that there was  
10 someone you wanted to marry?

11 THE WITNESS: I did. It didn't mean that you did  
12 get to marry him just because you asked.

13 THE COURT: You were allowed to express it?

14 THE WITNESS: You were allowed to express it.

15 THE COURT: But not necessarily allowed to marry?

16 THE WITNESS: Right. Right.

17 BY MR. HOOLE:

18 Q And this was when you were 16?

19 A Yes.

20 Q Your father at one point responded to a question from  
21 the prophet saying yes, she's obedient?

22 A Yes.

23 Q Was that true?

24 A To my father, yes. Me and my father got along very  
25 well. We had a very -- we had a very close relationship.

1 Q It seems, Gina, that maybe you had a little bit of his  
2 independent thinking yourself?

3 A Maybe a little too much.

4 Q Is that maybe why you got married so early?

5 A Yes, I believe so.

6 Q Did you see that as a pattern within the community?

7 A Yes. I actually started wondering.

8 Q So in terms of being obedient, were you trying to be  
9 obedient to Warren Jeffs?

10 A I married into a family who was 100-percent whatever  
11 the prophet said went. I was not taught that as a child. I  
12 was taught that the prophet was a man and he can make  
13 mistakes. And when I expressed those to this family I was  
14 married into, they told me I was speaking apostasy.

15 Q They were of the type of family that believed the  
16 prophet could never do anything wrong?

17 A Yes, never do anything wrong.

18 Q And your father said he's just a man like any other  
19 man?

20 A Yes.

21 Q What grade had you completed by the time of your  
22 marriage?

23 A So I went through public school because that's -- the  
24 public school that was in Colorado City, until two months  
25 into seventh grade. And then I did home school the rest of

1 seventh grade, and that is when everybody got pulled from  
2 the public school and we were told to only do private  
3 schools.

4 I did get held back. So by the time in eighth grade I  
5 was -- after I had graduated eighth grade -- because they  
6 did a graduation to show up everybody to Warren -- I was  
7 16 -- I had turned 16 that year, and I got married within a  
8 month of turning 16.

9 Q And it was a legal marriage?

10 A No. In December I was transferred over to Caliente in  
11 a motel room. I met my husband five minutes before. I  
12 didn't know who he was. He was from Salt Lake. I was from  
13 Colorado City. I met him five minutes before they told us  
14 to go home and multiply and replenish the earth pretty much.

15 THE COURT: I'm sorry. I didn't understand that.

16 THE WITNESS: I'm sorry. They told us -- I met my  
17 husband five minutes before. When they married us, they  
18 told us to go home and multiply and replenish the earth.

19 BY MR. HOOLE:

20 Q Did you have children with this husband?

21 A I did. I had two.

22 Q Two children. Okay.

23 So you are doing what you're told in terms of entering  
24 into a marriage?

25 A Yes.

1 Q And it was Warren Jeffs who told you to marry?

2 A Yes.

3 Q Did he also perform the marriage?

4 A Yes.

5 Q This was in Caliente, Nevada?

6 A Uh-huh. (Affirmative)

7 Q The same motel where others were married?

8 A Yes.

9 Q Since you have a trafficking claim, let me ask you some  
10 questions about your family and the experience they had.

11 Your husband was Richard Rohbock?

12 A Yes.

13 Q Okay. Were you required to work on behalf of Warren  
14 Jeffs, and your husband?

15 A My husband worked for a company called -- at the time  
16 it was called John Bigley and Sons, and it transferred to  
17 Phaze Concrete.

18 Q So John Bigley --

19 A And Sons --

20 Q -- and Sons became Phaze Concrete.

21 A Phaze Concrete, yes. And that was the first company  
22 where -- I had had my son, he was about three months old,  
23 and we were living in a little studio apartment in Colorado  
24 City, and my husband came to me and said, hey, I can take  
25 you with me to work. I said okay.

1           And the reason he wanted to take me is because if I  
2   went to work with him, I could get food. I could eat. What  
3   I didn't realize is when I got down there, I was put in a  
4   position to cook and clean for 32 men.

5   Q     Let me ask you this. Your husband is working for Phaze  
6   Concrete?

7   A     Yes.

8   Q     And you're living in Colorado City?

9   A     Yes.

10   Q     He wants to take you with him. Is that because he's  
11   out at work sites around the country?

12   A     Yes.

13   Q     And moving around?

14   A     He was in Nevada -- we were in Nevada for about three  
15   years at first. So Nevada was our main place.

16   Q     So if you went with him, you thought you could have  
17   food for your family?

18   A     I felt like I would be better taken care of, yes.

19   Q     Okay. How long were you in Nevada?

20   A     I was in Nevada for -- well, I guess it was only two  
21   years, because I had my -- when my daughter was born -- and  
22   she was only six weeks old, and that year that she was born,  
23   we moved 15 times.

24   Q     I understand that you lived in various different  
25   states?

1 A Uh-huh. (Affirmative)

2 Q Going with your husband as he was working for the  
3 church controlled business?

4 A Yes.

5 Q And those states involved New Mexico, Utah, Nevada,  
6 Arizona, Wyoming, Montana, and Arizona; is that right?

7 A Uh-huh. (Affirmative)

8 Q Did I leave anything out?

9 A No, I don't believe so.

10 Q And during all of those times was your husband working  
11 for church owned companies?

12 A Yes.

13 Q Was it Phaze Concrete?

14 A So he worked for Phaze for multiple -- it was the  
15 longest time. Once they tried to tell my husband they  
16 weren't going to give him \$100 a day when he was working  
17 some days up to 24 hours and only getting \$100 a day.

18 So it was always like one guy that was kind of over the  
19 whole crew, an older guy. He took us into a meeting and  
20 told us -- and I actually don't even know why I was in these  
21 meetings, but I just was there -- and told us that -- we  
22 were working on the Canyons up in Heber -- in Park City.  
23 That was the building they were building. And we were there  
24 for six months, and he said we have donated off this Canyon  
25 \$1.5 million already to the priesthood. And I was like holy



1 cow. I mean I don't even know what that kind of money looks  
2 like. I was so blown out of the water. To me I could only  
3 imagine it.

4 Q So was he getting his wages?

5 A Barely, sometimes.

6 Q Barely, sometimes?

7 A So they said you got \$100, but then if the priesthood  
8 asked for a donation of like a thousand dollars. I mean  
9 \$100 a day for five days a week is only \$2,000 a month. So  
10 if the priesthood would call and say we need you to donate a  
11 thousand dollars or donate \$2,000, it was all automatically  
12 directed to the priesthood for donation.

13 THE COURT: You were, however, during this time  
14 being provided food?

15 THE WITNESS: Yes, food and housing, but I was  
16 living in a home with sometimes up to 32 men.

17 THE COURT: Okay. And clothing also for you and  
18 your children?

19 THE WITNESS: Yes. I made my clothing when we  
20 were provided with materials.

21 THE COURT: Mr. Hoole, this does raise an issue  
22 that I think we're going to have to have you address  
23 sometime, and that is simply that even with all this  
24 testimony that you have solicited about them not being paid,  
25 not having money in their pocket, I think all of them have

1 testified that they were provided the necessities of life.

2 MR. HOOLE: Let me address that, if I could.

3 BY MR. HOOLE:

4 Q So first with respect to your husband, in all these  
5 states where he worked for the church, for the benefit of  
6 the prophet, was he generally able to keep his wages?

7 A No.

8 Q Okay. Were you paid for any of the services you  
9 provided to these work crews?

10 A No.

11 Q In all of these states, did you provide cleaning,  
12 cooking, meals, laundry for the, what, 32 men you said?

13 A Sometimes up to 32 men, or more, yeah.

14 Q In all of these states?

15 A The majority of them, yes.

16 Q And were you paid for that?

17 A No.

18 Q How did you pay for the food?

19 A They gave us a company card. And then the church paid  
20 for the housing -- the company paid for the housing, and we  
21 got a company card that I would go shopping. And we had  
22 like so much we could spend. I would go shopping and I  
23 would come up with the cheapest meals that I could come up  
24 with to feed these men.

25 Q So the card, did it cover the food you needed to buy?

1 A The budget they gave me, no, not all the time.

2 Q And how did you make up the difference?

3 A I had food stamps.

4 Q I'm sorry?

5 A I used my food stamps for my kids. I'm sorry.

6 Q That's okay.

7 Can you repeat your last answer.

8 A I had a food stamp card that I would use to make up the  
9 difference to make sure that these men and we got fed.

10 Q Did you have to draw on your own family income?

11 A Multiple times, yes.

12 Q Was there enough to feed your family?

13 A Sometimes.

14 Q Did your family go hungry sometimes?

15 A My children and my husband, I made sure that they  
16 didn't go hungry. When I was in Montana, there wasn't  
17 enough food for me to eat, so I quit eating. And I had a  
18 hormone called HCG that suppressed your appetite, that they  
19 were giving around to the women that were a little bit  
20 overweight, and I started using it. I had to inject myself  
21 with it so I wasn't hungry.

22 Q Did you inject yourself with this hormone?

23 A Yes, I did.

24 Q And the purpose was to suppress your appetite?

25 A Yes.

1 Q And you say this was used by the FLDS people?

2 A Yes, all of the little bit overweight women.

3 Q Overweight women?

4 A Yeah.

5 Q Was it used by FLDS women or others because they didn't  
6 have enough to eat?

7 A I'm not sure. That was my experience.

8 Q Okay. So you didn't have enough for your family?

9 A That's why I did it, because the only food I got was  
10 whatever my children left on their plates after they ate.

11 Q What period of time was it when you were not getting  
12 enough food?

13 You mentioned Montana. Did this happen in other  
14 states?

15 A It was -- no. When I wasn't getting enough food, it  
16 was in Montana. Yes, we used our own pay to help -- like I  
17 said, my food stamps and stuff to help in those other  
18 states. But in Montana, all I had was \$150 a month on food  
19 stamps, and it wasn't enough to feed my children and me.  
20 This happened for three months. When I was in Montana, they  
21 completely cut us off money. I could not get home because  
22 they gave us barely enough fuel so the guys could get back  
23 and forth to work.

24 Q In Montana, who cut you off from your money?

25 A I found out later that Lyle Jeffs, because Warren told

1 him to, would go into the companies and tell -- they would  
2 say we've got to send the men money so they can keep  
3 working. And he would say how much money is it going to  
4 take to get them back and forth to work with their trucks.  
5 And then he would tell them to give him the rest of the  
6 money from the company. So they had no money to send up to  
7 us.

8 Q For what?

9 A Food, gas, anything.

10 Q So you had a food card at some point?

11 A Yes. We had a credit card, and then it just got worse.

12 Q And then that completely went away?

13 A Yeah.

14 Q And so you had \$150 in food stamps per month?

15 A Uh-huh, because my husband worked on a base and they  
16 had to show that he was making so much money.

17 Q Because it was a government contract?

18 A Yes. And so because they had to show it, then we could  
19 only get \$150 for food stamps.

20 Q So he had to show that income, and that limited how  
21 much you could get in food stamps?

22 A To support me and my children, yeah.

23 Q You had food stamps and whatever wages he was allowed  
24 to keep?

25 A At that time he didn't have wages.

1 Q You're still responsible for feeding 30 men?

2 A We were. I actually -- at that time it was like you  
3 guys have got to figure it out for yourselves, kind of,  
4 because at that time I was like I can only support -- and  
5 they kind of -- we all -- in the house that we lived in with  
6 these 32 men, we all kind of knew that. So these 32 men  
7 were starving.

8 Q You're still taking care of all their needs?

9 A Some of it. I did their laundry. We didn't have food,  
10 so we couldn't cook. I mean they would go poach deer. We  
11 were in Montana.

12 Q Would it be accurate to say that you were starving?

13 A I was starving.

14 Q So you're taking these injections, and you testified  
15 that there was some kind of reaction to that?

16 A Because of the injections and the starving, and I was  
17 up there, I knew something was wrong with me. And I had  
18 called my family -- different people in my family and told  
19 them to come and get me. I need help. I didn't tell them  
20 the extreme. They would call my husband and he would say  
21 no, I'm going to be taking her home. And then two weeks  
22 later they would tell us we can't come home yet. We don't  
23 have the money to bring you home.

24 So I was calling my family members. Finally I called  
25 my sister Dawn, who was an apostate at the time, and I

1 said -- she lived four hours away. She was in Idaho, four  
2 hours away from where I was.

3 Q Where was she?

4 A In Idaho. And I says I need help. Will you come and  
5 get me and my children? And she said, Gina, do you love  
6 your husband? And I said I love him dearly. And she said  
7 then you need to make it work. But I didn't tell her the  
8 extremes I was in up there because I was so embarrassed.  
9 But she said, you know, there's a person coming up this  
10 weekend. If you still feel this way this weekend, you jump  
11 in with him with your children and come.

12 It was my brother Joe that was going to be going over  
13 there. And he went and told my husband's brother that I was  
14 leaving my husband because my husband was working so many  
15 hours that we weren't really able to talk. And my husband's  
16 brother finally walked up to him and said you know your wife  
17 is leaving you, right? Something is wrong with her and  
18 she's leaving you. And he called down there and told the  
19 bishop's office that he had to get me home or I was going to  
20 leave him. And all of a sudden they had money to get us  
21 home.

22 Q Help us understand, during this period of time, how  
23 much the church provided for you in terms of housing and  
24 money apart from the income that your husband was able to  
25 keep. Do you have any sense compared to what you needed?

1 A I think I don't understand the question. I'm sorry.

2 Q I appreciate that. The Court wanted to get some  
3 clarification on what benefits you were provided as a family  
4 by the church for being on the road taking care of these  
5 crews, as a family.

6 A I had clothes. We always had power and water. The  
7 majority of the time we had food. But like I said, that was  
8 over. It just got worse and worse and worse until there was  
9 nothing.

10 Q Are you able to quantify it somehow in terms of --

11 THE COURT: Why don't we take a break and you can  
12 perhaps discuss this with her.

13 THE WITNESS: Sorry. When I say nothing, I mean  
14 the clothes we wore were three to four years old.

15 MR. HOOLE: Thank you, Your Honor.

16 THE COURT: We'll take ten minutes.

17 (Recess)

18 MR. HOOLE: Thank you for the break, Your Honor.

19 THE COURT: Mr. Hoole, do you understand my  
20 concern with not just this witness's testimony but those of  
21 the others where you have tried to establish the loss of  
22 income where we have not really had testimony with any  
23 specificity on the benefits that they didn't derive from the  
24 church in terms of their basic necessities of life? And I  
25 don't know what you intend to do about that.



1 MR. HOOLE: Well, it's a very good question,  
2 Your Honor, and part of the problem is the plaintiffs lived  
3 in a world where those values weren't known. They had their  
4 housing. They had their jobs. They were given food that  
5 was supposed to be sufficient for their needs. They didn't  
6 live and understand an economy like we do. So that's their  
7 challenge.

8 And I think, Your Honor, co-counsel gives me a  
9 good suggestion. Maybe we need to spend a little time with  
10 them and submit sworn affidavits addressing that.

11 THE COURT: That would be acceptable. There's got  
12 to be more than just their own estimate as to the value of  
13 their housing. There's got to be some type of -- I'm not  
14 suggesting an expert witness or anything of the sort, but  
15 there's got to be some outside source to establish to the  
16 Court's satisfaction that whatever figures they may supply  
17 has some basis in fact.

18 And as you were just alluding to, it is  
19 challenging because you could take the normal cost of  
20 providing housing during the years we're talking about on a  
21 statewide basis, a national basis, but because of the unique  
22 housing situation in Short Creek, it probably would not be  
23 very relevant. But I've got to have something. You've got  
24 to supply me with something.

25 MR. HOOLE: Those concepts were quite foreign, but

1 I think we can address that in a conservative way through  
2 declarations and affidavits.

3 THE COURT: That would be appropriate.

4 MR. HOOLE: Thank you. And I'll try to get a  
5 little bit more specific with Gina Rohbock.

6 THE COURT: Okay.

7 BY MR. HOOLE:

8 Q Gina, are you doing okay?

9 A Yeah.

10 Q Let me ask you some questions. When I indicate to the  
11 Court that the people in the community living under the  
12 united effort plan and the trust, they had their housing  
13 provided?

14 A Yes.

15 Q And if they were considered worthy, they could go to  
16 the storehouse and get food?

17 A Yes.

18 Q Utilities they had to pay. How did they pay utilities?

19 A Most of the time we could -- like the company would  
20 say, well, you donated your money. We already have donated  
21 your money to the priesthood, but we'll give you this amount  
22 so that your power doesn't get shut off. A lot of times my  
23 power was two to three months behind.

24 Q But the economy was different than the economy you live  
25 in now?

1 A Yes, big time.

2 Q And did you have an understanding of how values  
3 actually worked at that point?

4 A Not at all.

5 Q So we can now take your current knowledge and apply  
6 that to what you lived through and be able to provide to the  
7 Court some affidavits --

8 A I believe, yeah.

9 Q -- to reflect that?

10 Let me, nevertheless, ask you to go through each state  
11 you lived in.

12 A Okay.

13 Q Tell me what you did receive from the church in terms  
14 of your basic needs. And I'm going to define that as  
15 housing and utilities, food, to the extent you got money for  
16 food, and medical, to the extent you had insurance for  
17 medical care. And then also some discretionary funds to  
18 take care of gas and things like that.

19 So what was the first state, then?

20 A That would have been Nevada.

21 Q And how much did you receive from the church there in  
22 terms of money, because I'm assuming for all these states  
23 you had housing?

24 A Yes. At that time we had the housing. It was taken  
25 care of.

1 Q Now on housing --

2 A The house we had was a five-bedroom home with a lot of  
3 garage space. So they would go turn the garage space into  
4 more bedrooms. The living rooms were turned into bedrooms.

5 Q How many people lived in the house?

6 A Thirty-two. Sometimes more would show up on weekends.

7 Q So quite crowded?

8 A Yes. It was very crowded.

9 Q But to some degree housing was provided there?

10 A Yes.

11 Q Utilities?

12 A Yes.

13 Q And is that the case for every state?

14 A Yes. Yes. Every state our housing and utilities were  
15 covered.

16 Q And in every one of these states did you share a single  
17 home with all these people?

18 A The majority of the time, yes. Sometimes we were --  
19 because like when my daughter was born, we moved 15 times.  
20 Sometimes we were all in just like -- we were there for like  
21 a month or two, so they would just rent up like little  
22 studio apartments, or like month-to-month rentals. I would  
23 stay in there, and they would give me money. And sometimes  
24 there was like maybe up to ten men that would come into my  
25 studio apartment, or I would take food to their studio

1 apartment.

2 Q Housing and utilities were usually paid for?

3 A Yes. Housing and utilities were always paid for.

4 Q Now did you ever have money for medical needs?

5 A No.

6 Q Did you ever have medical insurance?

7 A Through the government.

8 Q The government. Okay.

9 THE COURT: You mean Medicaid or Medicare?

10 THE WITNESS: Yes.

11 BY MR. HOOLE:

12 Q So in terms of food, the amount that you received  
13 seemed to diminish over time. Take us through the states  
14 you lived in and tell us how much you received in each state  
15 to the best of your memory.

16 A Well, I can do that pretty simple. So when I first  
17 started in Nevada, every week -- and that was when I had  
18 anywhere from 25 to 40 people at the house. Most of the  
19 time it was 32 to 40. They would give me \$120 a week to  
20 cook meals for these men and my family.

21 You have to realize that we were taught at a very early  
22 age to cook very cheap. We learned how to make stews out of  
23 basically nothing. We shopped at the cheapest places we  
24 could find.

25 Q What would you buy?

1 A Vegetables, potatoes. Pasta was really cheap. A  
2 little bit of meat. Like if a recipe said one pound of  
3 meat, we'd use one pound of meat and eight times it. That's  
4 how much we laid off.

5 So we -- you know, ground beef was cheap. Chicken was  
6 a little cheaper back then. You have to realize this was  
7 back in 2003, so the economy was less. The whole time from  
8 2003 clear up to 2011, just because of the economy, we had  
9 to have more money, but we were still eating that same way.

10 Q Because things got more expensive --

11 A Right.

12 Q -- over those years?

13 A Yes. But we still are eating that same way.

14 Q So you had \$120 a week in Nevada in 2003. And how long  
15 were you in Nevada?

16 A Until my daughter was born in 2006.

17 Q Okay. And where did you go in 2006?

18 A In 2006, that's when I moved the most. We went to New  
19 Mexico for two months. Then we went up to -- back up to  
20 around the Salt Lake area. We moved three times around the  
21 Salt Lake area. Then we went up to Wyoming.

22 Q This is all in 2006?

23 A Yeah. And then we went to Arizona. I mean it was --  
24 that year was a blur.

25 Q I'm sorry?

1 A That year was kind of a blur to me.

2 And then we ended up in Heber City, and we stayed up  
3 there. And at that time we had men coming in and out --  
4 different men in our home, and that home had three bedrooms  
5 upstairs. And then we had like this big living room  
6 downstairs that the men slept in. And then I slept with my  
7 two children in one bedroom. The other two bedrooms were  
8 taken by the men. And at that time we had a few less men.  
9 Sometimes there was 12. Sometimes there was 18. But we  
10 still ate pretty much the same way.

11 Q Are you still on the \$120 a week budget?

12 A It went up because the economy went up, but the feel of  
13 it was still the 120. It was still the same food that we  
14 were eating.

15 Q But for practical purposes it was \$120?

16 A Yeah, it felt like that. But it was more -- by that  
17 time, because, you know, everything just jumped like crazy,  
18 I mean we were buying the same stuff for \$300 now a week.

19 Q Okay. So can you help us know when the amounts went  
20 up?

21 A Yeah. So in Nevada, after about a year and a half,  
22 they started giving me \$200 because it had jumped that much.  
23 I just told them I can't -- I mean it's a joke to try and  
24 cook on this much. I can't do it anymore. So they were  
25 like, okay, we can give you \$200.

1           Then it went up a little bit more. When my daughter  
2 was born, we were still down there, and we had one of the  
3 bosses' wives there, and she said this is ridiculous. What  
4 are you guys doing? You can't even go grocery shopping on  
5 \$200 for this many people. So they jumped it to \$400.

6       Q     You're still in Nevada?

7       A     Yes.

8       Q     Okay.

9       A     It stayed about 400 clear until -- I would say until we  
10 got to Montana. It was about four or \$500 a month.

11      Q     And tell me again where Montana fit into this. I may  
12 not have heard you.

13      A     That was clear at the end. That was the last place  
14 that I went.

15      Q     After Heber?

16      A     Yes.

17      Q     And how much, again, in Montana a week?

18      A     I would say four to \$500, and that was when we had the  
19 most people living with us.

20      Q     Did you say \$500?

21      A     Four to five, and that's when we had the majority of  
22 people. Like we had anywhere from 32 to 40. When I say 32  
23 men, I'm not talking about the other three women that lived  
24 in the house with their families. I had two children, and  
25 one woman had six children. So we had over 40 people,



1 probably, living in the home.

2 Q The buying power was about the same?

3 A Yes. It never really changed just because. The only  
4 reason it had to change is because the economy changed. We  
5 couldn't get the same ingredients that we got with the 120.

6 Q You left in 2011?

7 A 2012.

8 Q In 2012.

9 A February of 2012.

10 Q When did you stop taking care of these work crews?

11 A After I got sick.

12 Q Okay. And what year was that?

13 A The first thing that happened to me, because we were so  
14 malnutrition'd -- my daughter had been three years old. I  
15 had not been breast-feeding her for a year and a half, and I  
16 started getting infections from my breasts.

17 Q I'll address that with you in a minute. I'm just  
18 wondering when you stopped taking care of these work crews.  
19 What year was that?

20 A 2010, when we went home from Montana.

21 Q And in 2010 you were getting four to \$500 a week, but  
22 the buying power was still about \$120 --

23 A Yes.

24 Q -- in terms of what you were able to accomplish back in  
25 2003?

1 A Yes. It felt the same way.

2 Q And you're still feeding --

3 A More men than I was.

4 MR. HOOLE: Your Honor, does that help?

5 THE COURT: It does.

6 MR. HOOLE: Okay.

7 BY MR. HOOLE:

8 Q Now the housing, was it adequate for your needs?

9 A No, not at all.

10 Q Did the utilities ever get shut off for lack of  
11 payment?

12 A They did once in Montana.

13 Q Don't tell me it was the winter.

14 A No. Gratefully it wasn't.

15 Q And you always had some kind of Medicaid or Medicare --

16 A Yes.

17 Q -- that you could fall back on?

18 A Yes. The majority of the time.

19 Q Did you have any discretionary funds, anything --

20 A What does that mean?

21 Q That means money in your pocket you could use for  
22 something that came up that you needed to do, or was that  
23 still --

24 A Only if we were told, because one time me and my  
25 husband were told we could go on -- we never went on a

1      honeymoon or anything like that. The company had asked --  
2      because we had been doing so much, and I had been working  
3      and doing so much for the company that they decided to award  
4      us. So they gave my husband -- to come up here to Heber and  
5      take me for a week so that we could go on a vacation I  
6      guess. And that was probably the most money we actually had  
7      in our pocket at the time -- I mean because they gave us  
8      money to go on. It was completely paid.

9      Q      Okay.

10     A      So that did happen once.

11     Q      When was that?

12     A      That was when we were in Nevada.

13     Q      How long were you on your vacation or honeymoon?

14     A      We were supposed to only be gone for four days, but we  
15     took a week.

16     Q      Okay. The food money that you were given, it went up  
17     over time, but its buying power seemed to drop off and then  
18     the money itself dropped off over time. Was it ever  
19     sufficient for your needs?

20     A      No.

21     Q      During this period of time your husband was receiving  
22     some wages; is that correct?

23     A      Very little sum.

24     Q      What happened to the rest of his wages?

25     A      They were donated.

1 Q How were they donated?

2 A Sometimes we got like a text of the reason your check  
3 is only \$200 is because we donated the rest to the  
4 priesthood.

5 Q It was donated without your consent?

6 A Yes.

7 Q Did you ever object to that?

8 A Yes.

9 Q Did that get you anywhere?

10 A No.

11 Q So these were donations in the sense that they went --  
12 the money went to the church and Warren Jeffs, but you  
13 didn't really donate it?

14 A We were told that we were paying -- we didn't know  
15 where Zion was because we didn't know about Texas.

16 Q If you had refused, if you had brought a claim under  
17 the federal Fair Labor Standards Act, for example, for not  
18 paying overtime or not paying wages, what would have  
19 happened?

20 A Nothing.

21 Q Would you have been disciplined for that?

22 A Oh, yeah. Well, my husband probably would have got  
23 kicked out.

24 Q Okay.

25 A We would have been reprimanded I guess. I can say we

1 would have been reprimanded.

2 Q Would there have been severe harm to you or your family  
3 members?

4 A That was already happening because we did say  
5 something.

6 Q Why did you do this, then? Why were you going along  
7 and letting them basically starve you as you tried to  
8 support these workers?

9 A Because I didn't want to go to hell.

10 Q I'm sorry?

11 A I didn't want to go to hell.

12 Q And you were afraid if you got kicked out you would go  
13 to hell?

14 A I knew I would.

15 Q Okay. And did you continue to believe Warren Jeffs was  
16 the prophet at this time?

17 A 100 percent.

18 Q Can you give me an estimate of how much you worked --

19 THE COURT: Excuse me. May I ask, do you ever  
20 recall a time when Warren Jeffs specifically told those who  
21 were being disobedient that they would go to hell or they  
22 would lose their opportunities in the hereafter, or anything  
23 similar to that?

24 THE WITNESS: Yes. He said it multiple times in  
25 church.

1           THE COURT: And you remember hearing that  
2 yourself?

3           THE WITNESS: Yes.

4           MR. HOOLE: Thank you, Your Honor.

5 BY MR. HOOLE:

6 Q Between 2003 and 2010, while you were on the road  
7 living in these various states, supporting these crews, how  
8 many hours would you work a week? Was it full-time?

9 A I would say ten hours a day.

10 Q Every day?

11 A Every day. Seven days a week.

12 Q And you were never paid?

13 A What was that?

14 Q You were never paid?

15 A Never paid.

16 Q And that would be for that entire period of time?

17 A Yes.

18 Q Did your husband ever consider getting a job with the  
19 gentiles?

20 A Yes.

21 Q What are the gentiles?

22 A They're the people that had never been given -- well,  
23 the priesthood. Never have been given the right to  
24 priesthood, I guess. So they still had a chance, that was  
25 kind of how they put it.

1 Q So were gentiles better than apostates?

2 A Yes.

3 Q Were gentiles basically anybody that was outside of the  
4 group, that was not a former member?

5 A Yes.

6 Q Okay. And did your husband ever try to get a job with  
7 a company that was a gentile company?

8 A Yes, he did.

9 Q Tell us about that. When did that happen?

10 A That happened in 2008. We were working for Phaze  
11 Concrete, and they made the comment that we -- we were up in  
12 Heber, and they made the comment that we had donated  
13 \$1.5 million to the church. And I was sitting in that  
14 meeting, and the head of the -- I'm just going to call him  
15 John Bigley stands up and says I think we can do better  
16 within the next six months.

17 Q The 1.5, was that coming out of people's wages?

18 A Yes. And he says I think we can do better.

19 And so it's coming out of people's wages, and it was  
20 like the overhead, I guess, of what the company earned too.  
21 It was both.

22 Q So John Bigley, he's the owner of the company?

23 A Yeah. He was over -- head of the company.

24 Q The company that became Phaze Concrete?

25 A Right.

1 Q To your knowledge was he under pressure from the church  
2 to donate more money?

3 A Big time.

4 Q Were business leaders, people who owned businesses and  
5 ran them for the church, under pressure generally to donate  
6 money to Warren Jeffs?

7 A Big time. They were horrified they would lose their  
8 families.

9 Q And that money came out of the wages of the people. Is  
10 that fair to say?

11 A Yes. Yes, I would say that.

12 Q Okay.

13 A And he said I think we can do better. What if we quit  
14 even paying you your \$100 a day, even though they were  
15 basically -- they were still taking it as making donations.  
16 But sometimes we got like \$200 a month. That was a little  
17 bit extra.

18 Q I thought you said \$100 a day?

19 A \$100 a day was the wages, but sometimes we didn't even  
20 get that because they would take it and donate it.

21 Q The result was you didn't get enough to eat?

22 A I was eating at the time in Heber. We were still being  
23 taken care of. But I had to be with my husband because he  
24 didn't have enough money to send me.

25 So he says to us I think if we just take all your wages



1 and you come and ask me if you need things, that would be  
2 living the higher priesthood, and how do you feel about  
3 that? And no men dared say anything. And I was looking  
4 around like what is going on. So of course because I'm  
5 going to buy some -- you know, I raised my hand and I'm like  
6 I have a question. He's like what? I was like so you're  
7 going to buy my bras, and all my lady products, and you're  
8 going to buy exactly what I need. I'm going to give you a  
9 list and you're going to go to these stores and pick these  
10 up for me, the correct size, everything I need? And he says  
11 no. I would just give your husband that money and let you  
12 go do it. And I says, well, don't you think it would be  
13 better off to just pay these men their wages? I got very  
14 reprimanded for saying that.

15 Q You had some of your father's independence?

16 A I was a little bit crazy -- I mean they thought I was  
17 crazy.

18 Q Let me -- so that's how you reviewed it?

19 A That's how I reviewed it. That's how I looked at  
20 things as what are you thinking. In my mind why would  
21 somebody want to take that responsibility on.

22 Q Yeah.

23 A And he said, well, how do you guys feel about that?

24 The men said yeah, I think that sounds -- yeah. And he said  
25 we'll talk about it later.

1           After we left, my husband called him and said, Johnny,  
2 I work sometimes 24 hours. I want \$25 an hour. And I won't  
3 pay this. And that was the first time we got a check that  
4 was actually decent, that month. And the next month my  
5 husband still worked the same hours and his check was \$500.

6 Q     For the month?

7 A     Because they took it. And he was done. He called up  
8 Johnny and said I'm done. I'm not working for you anymore.

9 Q     So he said that to whom?

10 A     Johnny Bigley.

11 Q     So two questions. First, the money was taken for the  
12 benefit of Warren Jeffs?

13 A     Uh-huh. (Affirmative)

14 Q     That's a yes?

15 A     Yes. They said it was being used for the attorneys and  
16 building up Zion.

17 Q     Okay. And then your husband said, well, I'm not  
18 working for you anymore. And does this get us back to the  
19 gentile employer?

20 A     Yes.

21 Q     Tell us that story.

22 A     So when we got back to -- so when he decided he --  
23 Richard knew Wadman Corp. I think that's what it was  
24 called, Wadman Corporation. It was up here in Utah. And  
25 they knew Richard. Richard ran the whole division up there.

1 And they went to Richard and found out he was quitting  
2 Johnny, and they said we'll pay you \$41 an hour starting  
3 once you take the tests that you need to. I guess there's  
4 tests, or something, to run jobs. I didn't know about that.  
5 But he said once you take the tests we will raise you and we  
6 will give you a home that you can buy from us, because they  
7 had like their own little kind of community home. We  
8 actually built a bunch of their homes. And we'll give you  
9 one of those homes, that you can move your family. You can  
10 choose your own people that you want to work with. You can  
11 hire your own crew. And I was like, yeah, let's go for it.

12 Because Richard told Johnny he quit him, my mother  
13 called me and asked me if you were leaving and turning into  
14 apostates. Richard's mother called him and asked him to  
15 call Lyle. I was freaking out because we weren't apostates.  
16 We were just getting a good job.

17 Q You were just trying to support your family?

18 A Yeah.

19 Q Gina, I want to bring you back to this injection that  
20 you were giving yourself in Montana. What medical problems  
21 resulted from that, if you know?

22 A Because I was injecting myself with that, and starving,  
23 I was getting less than 200 calories a day, my body was  
24 eating itself. I didn't know this until -- actually I ended  
25 up in the hospital. I ended up in a -- I ended up in a

1 mental facility in Dixie, in Dixie in St. George, the  
2 clinic, for a few weeks. And one of them came out and told  
3 me because I had not been eating so much, that my body was  
4 eating my brain. And I lost memory to where when I came out  
5 of that clinic, I could not remember my children's names.

6 Q Were you able to open up to the people in the clinic  
7 about what had happened to you?

8 A After three months, I opened up with them, because we  
9 were told that if we said anything to anybody, it would hurt  
10 the prophet. Finally, after three months of my husband, at  
11 the time, coaching me, just tell them what you know, just  
12 tell them what's going on.

13 Q Did you end up having sores develop?

14 A That developed before -- that developed when we were in  
15 Montana. And I had came down because -- and I was staying  
16 and I wasn't getting food. So I had to go back up to  
17 Montana so that me and my children could get enough food.  
18 And because of my malnutrition, I ended up getting five  
19 surgeries on my breasts, because I constantly was getting  
20 mastitis. They thought it was cancer. And I dealt with  
21 that for a whole year, and they told me it was because I  
22 needed to have more nutrition, and I couldn't get the  
23 nutrition.

24 And then I went back to Montana because I was -- needed  
25 nutrition, and I thought we were going to get fed up there.

1 We were before. And it came down to where we weren't even  
2 getting food anymore.

3 Q You had five surgeries?

4 A Five surgeries, because I couldn't heal. It just kept  
5 on moving. The same infection kept moving everywhere  
6 because my body wouldn't heal.

7 Q The hormone that you injected, did it have an effect on  
8 you metabolic system?

9 A Yes. After I came back and they told me because I  
10 was -- I had lost a bunch of weight. Within one year of  
11 coming back, I had gained 120 pounds. My doctors told me  
12 the reason why is because my hormonal -- my body's  
13 hormonally imbalanced now because I had done that.

14 Q So rather than having these injections help you, they  
15 actually destroyed your ability to control your weight?

16 A Uh-huh. (Affirmative)

17 Q Is that a yes?

18 A Yes.

19 Q Thank you.

20 Growing up had you been taught about the 1953 raid?

21 A I had.

22 Q What were you taught?

23 THE COURT: Before too far away from it, what  
24 happened once your husband was called by Lyle Jeffs? Did  
25 your husband decide not to go to work for the --

1 THE WITNESS: Oh, yeah. Lyle told him that he  
2 needed to stay with the priesthood company. So he did quit  
3 Phaze, but we still stayed. So in Montana we were actually  
4 working for a different company besides Phaze.

5 THE COURT: He never did go to work for a gentile  
6 company?

7 THE WITNESS: No. He was never able to.

8 THE COURT: Thank you.

9 BY MR. HOOLE:

10 Q Were you told not to work for that company?

11 A Lyle said -- I don't -- so what my husband said is Lyle  
12 told me not to work because it was -- they were having a  
13 conversation. He told him to stay with the priesthood  
14 company, because if he left he would be tempted by the  
15 world.

16 Q And he complied with that out of obedience --

17 A To Warren, yes, because we full-heartedly believed that  
18 Warren was the one man on earth and we didn't know by that  
19 time.

20 Q So now the 1953 raid, was that something you were  
21 taught about as you grew up?

22 A Yeah. My father and his two wives were in the 1953  
23 raid -- his first two wives.

24 Q What were you taught about it?

25 A Mostly that they came in, took the mothers and

1 children, the fathers to prison. My father was one of the  
2 first men to get out because he was very young when it  
3 happened and he -- when the fathers came back, the mothers  
4 and children were all gone.

5       They took -- they -- you know, my mothers were actually  
6 able to stay with each other and the children the whole time  
7 that they went with different families. After -- I'm not  
8 sure how long, but after a while they were all reunited.  
9 They came back because Arizona had to give the families  
10 back.

11 Q     Has that 1953 raid left a scar on the community?

12 A     100 percent, yes.

13 Q     And is that something that they look to as something  
14 really bad that happened to them?

15 A     Yes.

16 Q     Now that you're out of the group and you know about the  
17 1953 raid, which was an external threat to the movement --

18 A     Uh-huh. (Affirmative)

19 Q     -- how do you compare that external threat to the  
20 movement with what Warren Jeffs has done internally?

21 A     I feel like Warren Jeffs has done worse than the state  
22 did in the 1953 raid to those families and their children.

23 Q     More families have been impacted?

24 A     Yes. Mothers have been taken away from their children.  
25 More fathers have been taken away from their families. More

1 abuse. I think there's more abuse now than there was back  
2 then.

3 Q Okay. And it's an ongoing problem?

4 A Like I said, it gets worse every year. It's not  
5 getting better. It's getting worse every year.

6 Q Recently a gentleman by the name of Sam Bateman was  
7 arrested for having young girls in his custody --

8 A Yeah.

9 Q -- alleged crimes and pregnancies involving those young  
10 girls. Are you familiar with that?

11 A I know that two of my 15-year-old nieces were in that  
12 vehicle that was going down.

13 Q Was there evidence that they were pregnant?

14 A One of them -- at least one of them. Maybe the other  
15 one. My brother is trying to get custody over them right  
16 now.

17 Q If you could say something to them, what would you say?

18 A I would tell them I understand because I was in their  
19 same situation, but there is a light that is way brighter  
20 than anything we were taught. And they tell you that if you  
21 leave you're going to hell -- you're going to go to hell,  
22 but what they don't know is they are in hell.

23 MR. HOOLE: That's all I have, Your Honor.

24 THE COURT: Thank you, Ms. Rohbock. You may be  
25 excused.



1 MR. HOOLE: Your Honor, I think at this point, if  
2 it's okay, I would like to call Amy Nielsen, who would  
3 participate by Zoom. I think we have a link worked out.

4 THE COURT: I think we do, yes.

5 MR. HOOLE: And what I'd propose to do is just  
6 proffer her testimony quickly, and then have her respond to  
7 the proffer.

8 THE COURT: Fine.

9 MR. HOOLE: While she's joining, I wonder if the  
10 Court would allow me to ask Ruby Jessop one more question.  
11 I had neglected to ask her --

12 THE COURT: That will be fine. Just go ahead and  
13 do it.

14 MR. HOOLE: Ruby, can you come up for just a  
15 minute?

16 DIRECT EXAMINATION (Continued)

17 BY MR. HOOLE:

18 Q And I'm going to ask whether you had reviewed the  
19 common allegations in the lawsuit?

20 A Yes.

21 Q As well as your own specific allegations in the  
22 lawsuit?

23 A Yes.

24 Q Are those accurate?

25 A Yes.

1 MR. HOOLE: Thank you.

2 AMY NIELSEN,

3 Having been duly sworn, was examined

4 and testified as follows:

5 THE CLERK: Would you state and spell your name  
6 for the record.

7 THE WITNESS: Amy Nielsen. A-m-y, N-i-e-l-s-e-n.

8 DIRECT EXAMINATION

9 BY MR. HOOLE:

10 Q Amy, this is Roger Hoole. Can you hear me okay?

11 A Yes, I can.

12 Q Amy, we appreciate your joining us by Zoom today.

13 Have you had an opportunity to review the common  
14 allegations in the lawsuit?

15 A Yes.

16 Q Are they accurate?

17 A As far as I could tell, yes.

18 Q Have you been able to review the individual allegations  
19 made on your behalf in the lawsuit?

20 A Yes.

21 Q And are those accurate?

22 A Yes.

23 Q Okay. Were you born and raised in the FLDS?

24 A Yes.

25 Q Did you witness Warren Jeffs coming to power over the

1 FLDS people?

2 A Yes, I did.

3 Q After his father's death, did he become the prophet?

4 A Yes, he did.

5 Q Did you consider him to be the prophet?

6 A I did.

7 Q As the prophet, did you rely on the things he told you?

8 A I did.

9 Q Did he tell you that he was the prophet?

10 A Yes, he did.

11 Q Did he hold himself out to be the prophet?

12 A Yes.

13 Q And did the people in the community accept him as their  
14 prophet?

15 A Mostly, yes.

16 Q What happened to the ones that didn't?

17 A They were sent away.

18 Q Throughout your life were you commanded to marry and  
19 divorce, and change your marital relations by the prophet?

20 A Yes, I was.

21 Q Did you obey those commands?

22 A I did.

23 Q Okay. At one point in time were you sued by your  
24 husband?

25 A I don't remember --

1 Q Do you remember a divorce --

2 A -- being sued by him.

3 Q Okay.

4 A Yes.

5 Q Do you remember a divorce case brought by Wallace  
6 Jeffs?

7 A Yes.

8 Q And who is Wallace Jeffs?

9 A He's Warren's brother.

10 Q Okay. And in that case do you remember having your  
11 deposition taken?

12 A Yes.

13 Q When you went into that deposition were you striving to  
14 be faithful to the prophet?

15 A Yes, I was.

16 Q During that deposition did you learn information that  
17 you had not heard before?

18 A Yes.

19 Q Do you remember what that information was?

20 A It was what Warren was doing at the temple with  
21 other -- with his wives.

22 Q Are you talking about sexual conduct?

23 A Yes.

24 Q What was your reaction to hearing that?

25 A I was very alarmed.

1 Q And had you ever heard those things before?

2 A No, not like that.

3 Q Had you ever heard rumors of things?

4 A No.

5 Q Did your belief in the prophet -- strike that.

6 Did you ever hear Warren Jeffs acknowledge that he  
7 wasn't the prophet while you were still in the group?

8 A Yes, I did.

9 Q Did you believe it when you heard it?

10 A No, because he always said, when he told us that, it  
11 was a test, just to test our faith if we would still follow  
12 him.

13 Q I see. When you learned more information in the  
14 deposition, did it have an effect on you?

15 A Very much so.

16 Q Describe that for the Court, please. What happened?

17 A When I learned of what he was doing with the wives in  
18 the temple, the underage girls, and the fact that he had  
19 told me that I was going to be there and learn what he  
20 called the higher law of Sarah. I just -- I was -- I  
21 couldn't believe it, I was just so taken back by it, and I  
22 wanted to go. I wanted to run from it.

23 Q And the higher law of Sarah, did that involve sexual  
24 relations between Warren Jeffs' ladies?

25 A Yes, it did.

1 Q Were you at one point pegged to become one of his  
2 wives?

3 A Yes.

4 Q And was that interrupted by his incarceration?

5 A No, because it was over the phone that he told me that  
6 I would be in the -- I would be taught the higher law of  
7 Sarah with other wives of his.

8 Q Do you know whether he was driving to Short Creek for  
9 the purpose of marrying you?

10 A Yes. He told me he was.

11 Q And that's when he was stopped in Nevada and arrested?

12 A Yes. He said we would meet out of Short Creek. He  
13 wasn't going to come to Short Creek, but he said we would  
14 meet out of Short Creek, and he would have someone pick me  
15 up.

16 Q And that didn't happen, correct?

17 A No, it didn't.

18 Q But you remained faithful and loyal until your  
19 deposition?

20 A Yes. Yes, I did.

21 Q When you left your deposition, did you make any  
22 decisions regarding your life?

23 A I immediately wanted to leave.

24 Q Leave your religion?

25 A Yes. I told my son that we were going to leave the

1 state.

2 Q Did you feel like you had to leave the state in order  
3 to get away?

4 A Yes.

5 Q How long did it take you to actually accomplish that?

6 A It took me, I think, two or three months to actually  
7 find a way to go get a job somewhere else, but then it took  
8 months after before I could establish a place to bring my  
9 children to.

10 Q How many children did you have?

11 A Seven.

12 Q Seven children. Were you able to take them all with  
13 you?

14 A Yes.

15 Q Tell me the process in terms of -- you left the  
16 deposition and you are with your son, correct?

17 A Yes.

18 Q Was he considered your priesthood -- your priesthood  
19 head or your priesthood caretaker during that deposition?

20 A He was the priesthood they sent with me to the  
21 deposition.

22 Q And do you know why they sent him with you?

23 A They always felt like the women needed to have a  
24 priesthood bearer there wherever they were to go.

25 Q And do you remember making a comment to him as you

1 walked to the parking lot after the deposition?

2 A Yes.

3 Q What did you say?

4 A I said, Sam, we're getting out of here. We're going to  
5 California.

6 Q Why California?

7 A It's just the first place I thought just to get away.

8 Q Okay. So, Amy, you were the daughter of Wendell  
9 Nielsen, correct?

10 A Yes.

11 Q Was Wendell Nielsen a leader in the church?

12 A He was a leader, yes.

13 Q And was he in what might be called the first presidency  
14 with Warren Jeffs?

15 A Yes, he was.

16 Q Despite your closeness to the leadership of the church,  
17 did you have any idea that what you had been told may not be  
18 accurate?

19 A I guess the only time I really wondered is when I  
20 was -- when I was with Warren's family. Warren had me go  
21 live with his family, and Warren and Lyle were not on the  
22 same page about things that concerned me, and that's where I  
23 started believing it wasn't true.

24 Q Okay. Did that open the door a little bit so when your  
25 deposition took place you were able to make a decision?



1 A Yes, it did.

2 Q Okay. Amy, I need to ask you about how you've suffered  
3 from your time in the church. How would you describe any  
4 suffering?

5 A The hardest thing for me was they would use our  
6 children to get us to do what they wanted us to do. And  
7 what happened was when I went to live with Warren's family,  
8 Warren wanted me to accept my father's correction, and I  
9 told him I didn't know if I could accept it because I knew  
10 my father hadn't done anything. And he kept asking me -- he  
11 would call me in the evenings and continue to ask me to  
12 accept it.

13 And then he finally took one of my sons away and had  
14 him moved to Short Creek with Lyle. That was really, really  
15 hard, because my children were the most important thing and  
16 I just wanted to save them. But he used that as leverage --  
17 my son as leverage to get me to accept and to marry him. It  
18 was very hard on my son too as well.

19 Q Was that the only time you lost one of your children?

20 A Well, through this whole -- my children and I have  
21 lived in hiding most of my children's young years, until  
22 they were teenagers, and it has had a huge effect.

23 One of my daughters, she cannot get a job today. She  
24 can't go out in public. She has severe anxiety and even  
25 suicidal, and I work on a daily basis with her to help her

1 see that the world is not as bad as we were told it was.  
2 That's been quite a hard thing.

3 And we've been moved around from one different  
4 caretaker of Warren's to another in different houses, told  
5 we couldn't leave the house. We couldn't let anyone see us.  
6 No one could know we were there. We had our house in Short  
7 Creek taken from us. We had our vehicles taken away from us  
8 so we couldn't leave.

9 We were -- strictly the girls and I were to work for  
10 the storehouse and donate our time and talents to the  
11 storehouse, and that was our life.

12 Q What did you do for the storehouse?

13 A We sewed. We would sew clothing.

14 Q Okay. Have you had any medical bills since leaving  
15 related to what you went through?

16 A No, I haven't had any medical bills. My daughter, to  
17 this day I'm trying very hard to convince her that she needs  
18 to get help, but it destroys her more that she has to go  
19 have somebody help her through her problems. She can't  
20 handle even going to see the psychiatrist or a doctor. She  
21 just completely breaks down.

22 Q Do you attribute that to her experience growing up in  
23 the community?

24 A Yes.

25 Q So if you could, you would seek intervention for her --

1 medical intervention?

2 A I would do it very quickly. And there was one time she  
3 did go to the hospital because she was a threat to herself  
4 at that time. I mean her -- she's cut herself, trying to  
5 take the pain away. She cuts herself so that she won't feel  
6 the pain of what she's been through. But when she went to  
7 the hospital they would not let me talk to her because they  
8 thought that I was the problem. And so that's why my  
9 daughter today, she won't go anywhere because they think  
10 they're going to separate her from me.

11 Q I see. Were you able to work other than for the  
12 storehouse or did you have to remain in these houses of  
13 hiding?

14 A We had to remain in the houses of hiding.

15 Q And is that because of your familial relationship with  
16 the leadership of the church?

17 A Yes. And I believe he didn't want my ex-husband to  
18 find me or the children.

19 Q Okay. Can you give me an average of how many hours a  
20 week you would work for the storehouse and during what  
21 period of time?

22 A It was -- shoot, I want to say 2008 up until 2012.

23 Q And how many hours a week would you estimate?

24 A It was all day, every day. We spent -- I don't know.  
25 If I had a guess, it's probably a good part of the day,

1 every day.

2 Q Would it have been 40 hours a week?

3 A At least, yes.

4 Q Okay. And were you ever paid for any of that?

5 A No.

6 Q You did have a home through the trust to live in,  
7 correct?

8 A Yes.

9 Q Did you pay for your own utilities?

10 A Yes.

11 Q How did you have money for that?

12 A My boys would work at a parts store in town and we kept  
13 enough money to pay utilities. And then Lyle took the rest.

14 Q Did you have any kind of medical insurance?

15 A No, we didn't have that.

16 Q Did you have any money for medical needs?

17 A No, we weren't allowed to.

18 Q How did you get your food for your family?

19 A We had to go to the storehouse.

20 Q Were you allowed to go to the storehouse?

21 A Yes, we were.

22 Q Did that take care of your needs?

23 A Not even close.

24 Q What did you do to make up the difference?

25 A We couldn't. There wasn't anything we could do.

1 Q Did you go hungry?

2 A We lived on a lot of fruit. The choice at the  
3 storehouse was always quite slim. We didn't starve by any  
4 means, but we got used to bottled peaches.

5 Q Would you have done any of this if you had known that  
6 Warren Jeffs was not telling you the truth about things?

7 A No, I would not.

8 Q Were you given the information you needed in order to  
9 make informed religious decisions?

10 A No.

11 Q Was it a relief to get out?

12 A It was such a relief. It felt like walking out of a  
13 prison. Not that I know what that's like, but to me that's  
14 what I felt like. It was just a relief.

15 MR. HOOLE: Your Honor, I think that's all. I  
16 meant to proffer, but I just fell into asking questions.

17 THE COURT: This was actually better, so thank  
18 you.

19 MR. HOOLE: Unless there's anything else, I would  
20 excuse this witness.

21 THE COURT: Ms. Nielsen, thank you. You may be  
22 excused. You're welcome to stay on the Zoom call if you  
23 wish, but you're not required to.

24 THE WITNESS: Thank you.

25 MR. HOOLE: Thank you, Amy.

1           We have Carole Jessop standing by, I think on  
2 Zoom. We can proceed with that if the Court is ready.

3           THE COURT: All right. Is she the one who will be  
4 testifying and the other two will be confirming?

5           MR. HOOLE: That's right.

6                       CAROLE JESSOP,

7           Having been duly sworn, was examined

8           and testified as follows:

9           THE CLERK: Would you state and spell your name  
10 for the record.

11           THE WITNESS: Yes. My name is Carole Loraine  
12 Jessop. C-a-r-o-l-e, L-o-r-a-i-n-e, J-e-s-s-o-p.

13           THE COURT: Mr. Hoole, would you make certain that  
14 both Barlows are on the Zoom call as well, please.

15           MR. HOOLE: Yes. Carole, is Vergel on the call?

16           THE WITNESS: Yes. He's right here.

17           MR. HOOLE: And, Vergel, can you hear us okay?

18           MR. VERGEL BARLOW: Yes.

19           MR. HOOLE: Now I understand that Helen is at a  
20 birth right now. Is that correct?

21           THE CLERK: She's joining right now.

22           THE WITNESS: Yeah. She was going to try and  
23 join.

24           MR. HOOLE: I'll just wait for a minute, if that's  
25 okay.

1 THE COURT: Mr. Hoole, please explain to them how  
2 you intend to proceed as far as the other two go.

3 MR. HOOLE: Yes.

4 We have Helen now as well. Can you hear me?

5 THE WITNESS: I can't tell from my end. She has a  
6 separate link.

7 MR. HOOLE: Helen, can you hear us?

8 (No response)

9 MR. HOOLE: Okay. We should have Vergel, Helen,  
10 and Carole all participating by Zoom.

11 Carole, I see you. Vergel, I see you off the  
12 screen just a little bit. And, Helen, can you hear us?

13 MS. HELEN BARLOW: Yes.

14 They can hear me, right?

15 MR. HOOLE: They can hear you.

16 MR. VERGEL BARLOW: I really can't hear what  
17 they're saying.

18 MR. HOOLE: Can you hear Helen?

19 MS. HELEN BARLOW: Hi. This is Helen.

20 Vergel and Carole, can you hear Helen?

21 THE WITNESS: Yes. We can hear that.

22 MR. HOOLE: So what we're going to do today -- and  
23 I appreciate everyone's accommodation -- is because you are  
24 a family that went through much the same experience, I'm  
25 going to ask questions of Carole on behalf of the family.

1 And then I'm going to ask both Vergel and Helen to indicate  
2 whether they agree with that, whether they want to correct  
3 anything or add anything at the end. Is that okay? And we  
4 won't take too much time because it's a little bit awkward.

5 First off, let me ask whether all three of you  
6 have been able to review the common allegations in the  
7 lawsuit and your individual allegations as well, and whether  
8 you agree that those are accurate.

9 Carole, I will ask you first.

10 THE WITNESS: Yes. I have read those, and to my  
11 knowledge everything is accurate.

12 MR. HOOLE: And Vergel?

13 MR. VERGEL BARLOW: Yes. Everything is accurate  
14 in both summaries.

15 MR. HOOLE: And, Helen, have you read those and  
16 are those accurate?

17 I think we may have lost her. I can come back.

18 THE COURT: Let's wait.

19 MR. HOOLE: I knew this would be an exciting  
20 trial.

21 Helen, you have been able to read the common  
22 allegations in the lawsuit and your specific allegations?

23 MS. HELEN BARLOW: Yes, I have.

24 MR. HOOLE: And are they accurate?

25 MS. HELEN BARLOW: Yes.



1 MR. HOOLE: All right.

2 DIRECT EXAMINATION

3 BY MR. HOOLE:

4 Q So, Carole, I'm going to ask you questions and then  
5 I'll have everybody respond at the end.

6 Carole, with respect to your life, I understand that  
7 you were born and raised in the FLDS?

8 A Yes, that's correct.

9 Q And while you were a young child you watched five older  
10 sisters be placed into arranged marriages; is that correct?

11 A Yes. Yes, that's correct.

12 Q And at 18 you met with Warren Jeffs and he told you  
13 that you were going to be married as well?

14 A Yeah. There were two parts to that story. The first  
15 one, we just went to visit him. I told him I wasn't ready  
16 to be married. I ended up losing my job as a result of  
17 that. And then about two weeks later I was told to get  
18 married, yes.

19 Q And did you comply that second time?

20 A I did initially say that I wasn't ready, but I was told  
21 that it was time, so I did comply.

22 Q Did you consider Warren Jeffs to be the prophet?

23 A I was pretty young at that time, but yes, that's how I  
24 was raised and that was how the family believed, so yes.

25 Q But you were young?

1 A Yes, I was young.

2 Q But did you behave and act in conformity with a belief  
3 that at least your family held and that you had been raised  
4 to hold yourself?

5 A Yes, I did.

6 Q Okay. And at some point did you accept him as your  
7 prophet?

8 A Yes.

9 Q Okay. And did you act in reliance on things he said,  
10 commandments he made, directions he gave in order to comply  
11 with what he wanted?

12 A Yes.

13 Q And was being married one of those things?

14 A Yes.

15 Q Okay. And when were you married?

16 A I was married May 1st of 2003.

17 Q Was it a legal or spiritual marriage?

18 A It was a spiritual marriage only. I'm not legally  
19 married.

20 Q And did that involve Vergel Barlow and Helen Barlow,  
21 that marriage?

22 A Yes. Helen was there. I was married to Vergel  
23 spiritually.

24 Q So you're a plural family?

25 A Yes.

1 Q I'm going to just kind of go through this quickly.  
2 Your specific allegations indicate that at a point in time  
3 you started to notice that people were disappearing from the  
4 community.

5 A Yes.

6 Q Did that cause you concern?

7 A Yes, it did.

8 Q Did you know where they were going?

9 A No.

10 Q Did you know anybody that did know where they were  
11 going?

12 A We assumed they were going on some sort of a mission  
13 for the church, but it was mostly assumptions. A lot of it  
14 was kept quiet.

15 Q Were other people being sent away for disciplinary  
16 reasons?

17 A Yes.

18 Q In fact, did Vergel's father, Sam Barlow, get sent  
19 away?

20 A Yes.

21 Q Did that end up dividing a lot of families within the  
22 community?

23 A Yes.

24 Q And did that leave a lot of children behind without  
25 their parents?

1 A Eventually it did, yes.

2 Q Is that the condition today as well?

3 A To my knowledge, yes.

4 Q Okay. At one point in time were you asked to try to  
5 qualify for what was known as the United Order?

6 A Yes.

7 Q Can you explain what that process was?

8 A So we were given a list of questions to look over, that  
9 were fairly vague, and told we would have an interview, and  
10 be baptized if we qualified. If we didn't qualify, then  
11 midnight on New Year's, then I would be a nonmember.

12 Q A nonmember --

13 A When we got to the interviews, yes, those questions  
14 were very much different than the vague questions that were  
15 on the form.

16 Q What were the questions like?

17 A Oh, they were asking questions -- I think some of them  
18 were a little more like do you support Warren as your  
19 prophet, do you say your prayers, things like that. And  
20 then they started asking questions like Zion's law purity,  
21 and some of it started to get into like sexual relation  
22 questions that we weren't prepared for and I really wasn't  
23 sure where they were going with it. It wasn't stuff that I  
24 heard at church. It was kind of confusing.

25 Q Okay. Were things getting more and more extreme?

1 A Yes, definitely.

2 Q And were people trying to pass these new tests that  
3 were being placed before them?

4 A Yes. They were trying with all of their heart because  
5 they would be cut off the church if they didn't.

6 Q And were you trying with all your heart?

7 A Yes, I was.

8 Q Okay. Were you allowed into the United Order?

9 A No, I was not.

10 Q Did that threaten to split you between your family,  
11 including your own children?

12 A Yes, it did.

13 Q Explain that, if you would.

14 A So at first they told us that we could let the children  
15 under eight years old choose whether or not -- we can decide  
16 whether or not they were with the father and the mother, and  
17 that started to change.

18 And then I tried to get in again. I finally got a  
19 second interview. I thought I was doing everything right,  
20 and for some unknown reason they didn't let me in. But they  
21 let my eight-year-old son in at that time. So then he would  
22 for sure have to separate from me. And the younger  
23 children, I assumed they would be, but I was never told for  
24 sure.

25 Q Okay. And did the dividing of you from your

1 eight-year-old cause you to question anything?

2 A Yes. Through the whole process nothing quite made  
3 sense. It wasn't adding up with our religion we had grown  
4 up with. The whole thing just wasn't making sense anymore.  
5 So I was questioning a lot of things, but we weren't exactly  
6 allowed to question anything, so we couldn't ask questions.

7 Q Okay. And at some point did you decide you needed to  
8 get more information than you were allowed?

9 A Yes. Vergel had information about Warren's  
10 confessions, and he eventually showed those to me, and at  
11 that point, to me, it wasn't a question anymore. I wasn't  
12 going to follow it.

13 Q And Vergel was part of church security, correct?

14 A Yes.

15 Q They call that the God squad?

16 A Some people do. I'm not sure where that name came  
17 from.

18 Q But his job was to protect the prophet?

19 A That's what we understood, yes, when it first started.

20 Q Okay. So Vergel, did he come to you or did you go to  
21 him with these questions and the information?

22 A We had been -- I was asking him questions when things  
23 didn't make sense. We had conversations between us. He  
24 finally brought it to me.

25 Q Were you kind of testing the water with each other to

1 see if it was safe to --

2 A Oh, very much, yes. And this was just after he had  
3 been kicked out of security. I think it was a few months  
4 later, we kind of figured he would probably be sent away.  
5 So he had that knowledge and brought it to me after he was  
6 head of the security.

7 Q So you and I, at least, shared a concern that he might  
8 be sent away from the family?

9 A Yes, definitely.

10 Q Okay. Was Carole part of these discussions at that  
11 time -- excuse me. Was Helen part of these discussions at  
12 that time?

13 A I had a few vague discussions with her, but I think she  
14 had discussed it with Vergel a lot more than me. We were on  
15 very much different pages because she was in the Order, I  
16 was out of the Order, and we weren't technically supposed to  
17 be talking much.

18 Q Okay. Dividing up families makes it difficult to do  
19 that, doesn't it?

20 A Definitely.

21 Q Okay. Did you get a sense that children were being  
22 used to -- control over children was being used to control  
23 parents?

24 A Yes. Yes. That was happening so much at that point.

25 Q Okay. When you finally started to look at things, what

1 kinds of things did you see? What kind of information?

2 A Will you clarify what you mean?

3 Q What kind of information --

4 A What kind of information from -- so information that I  
5 found out that Warren was doing wrong was mainly his  
6 confessions from prison in 2007. He confessed to not being  
7 the prophet. And I did look into some of the things he  
8 said. He mentioned things about -- I don't remember the  
9 exact word, but being inappropriate with daughters and  
10 sisters. And there were stories and evidence that I sought  
11 out to confirm that --

12 Q And did you eventually --

13 A -- and kept discovering --

14 Q I'm sorry.

15 A I was just going to say that his sister Loraine was my  
16 aunt, married to my mom's brother. So I knew her personally  
17 and a lot of it added up.

18 Q So Loraine was one of Warren Jeffs' sisters, correct?

19 A Yes.

20 Q And do you recall whether she wrote a letter to Warren  
21 Jeffs confessing that she was somehow repenting for him  
22 molesting her as a child?

23 A Yes. I had that information given to me the same time  
24 I found out about Warren's confession, and it helped confirm  
25 it.



1 Q So as an illustration would it be fair to say that you  
2 were getting really pieces of the puzzle and putting those  
3 pieces in one at a time, and they were starting to make a  
4 picture that you could recognize?

5 A That's right.

6 Q How long did this process take for you?

7 A Well, that's a hard one to say because we had been told  
8 for so many years to set things on the shelf. And once we  
9 finally dared question it -- at that point I dared question  
10 it, and at that point things started to make sense when you  
11 look back and start piecing the puzzle together.

12 Q And you had to make your own decision about what that  
13 picture represented. Is that fair to say?

14 A Yes, that is fair.

15 Q And people make decisions on what that picture  
16 represents at their own speed. Is that fair to say?

17 A Oh, yes, definitely.

18 Q You couldn't push anybody to believe something. It had  
19 to be their own discovery?

20 A That's right. But they were withheld information. I  
21 think some of this information would have definitely made a  
22 difference like it did for me.

23 Q So if you had been told before you actually -- I'm  
24 going to say you broke the rules by looking at that stuff,  
25 would that be accurate?

1 A Yes.

2 Q Okay. If you had looked at it previously, do you think  
3 that would have sped your ability to recognize the puzzle  
4 and get out?

5 A Oh, yes. Yes. It was almost instant when I saw that.

6 Q Okay. Did all three of you recognize the puzzle at the  
7 same time or did it happen at different times for you?

8 A I do believe that Vergel and Helen had more information  
9 being in the Order, seeing a lot more than I was allowed to  
10 see. I believe they pieced a lot of it together before I  
11 did.

12 Q Okay. And at some point was the church's scrutiny of  
13 your family increasing? Did it increase?

14 A Yes. We were living with a lot of people, and some of  
15 them were very close to the bishop, and we know of people  
16 telling every little thing we were doing. It was like they  
17 were watching us very closely.

18 Q So people were spying on each other?

19 A Definitely, yeah. People within our own homes.

20 Q Okay. And was the fear that your family would be split  
21 up and perhaps Vergel sent away, children taken away, was  
22 that something on your minds at this point?

23 A Oh, so much, yes.

24 Q In order to prevent that from happening, at some point  
25 did the three of you make a decision about whether to stay

1 or leave?

2 A I believe Vergel and Helen had already decided to  
3 leave. They were somewhat waiting for me. So when I  
4 decided to leave, it was a done deal I guess.

5 Q Were you the slowest in making that decision?

6 A Yes, and a lot of it is because I didn't have the  
7 information they had. I was on the other side of things as  
8 far as the United Order.

9 Q They saw more of what was going to be expected into the  
10 future; is that right?

11 A I believe so.

12 Q They were aware of more. Okay.

13 In terms of -- so throughout this period of time until  
14 you started to doubt, were you a faithful follower of Warren  
15 Jeffs?

16 A Yes, I was.

17 Q Did you rely on what he told you in terms of his  
18 religious council and direction?

19 A Yes, for sure.

20 Q And did you do what he asked you to do?

21 A Yes. After I got married, I guess you could say I was  
22 a little more strengthened in my beliefs.

23 Q Okay. And at some point did you come to the belief  
24 that you had been misled by him?

25 A Yes, for sure.

1 Q And as a result of that, did you and Helen and Vergel  
2 suffer injury individually and as a family?

3 A Can you clarify that for me a little?

4 Q Did Vergel lose his job?

5 A Yes.

6 Q And this was when people started to suspect that you  
7 may not be as obedient as you needed to be?

8 A Yes.

9 Q And tell me about what the family finances were when he  
10 lost his job. What happened to the family?

11 A Oh, everyone that we were living with -- quite a few  
12 people, I think it was around 50 people ended up leaving the  
13 home besides our family. And then one of the grandmothers  
14 stayed with us. But as far as the finances, it pretty much  
15 came down to Helen's, and she was losing her job as well.  
16 She was working at the local clinic that was religious and  
17 she was dealing with a lot of pressure from them, patients  
18 not seeing her. And her job was being lost as well. So  
19 finances were pretty tight for a while.

20 Q Okay. So she was a midwife, and continues to do that?

21 A Yeah. She was a nurse at the clinic, and I believe she  
22 had just been certified to be a midwife.

23 Q Okay. Did there come a point where you didn't have  
24 enough money to meet your needs?

25 A Yes, for sure.

1 Q Did there come a point where you couldn't feed the  
2 animals that you had and were trying to take care of?

3 A Yes, that's right.

4 Q While you were in the community, were you working for  
5 any church run businesses, you yourself?

6 A I myself had been doing a lot of the home based care  
7 for disabled individuals up until I was pregnant with twins  
8 and all of this went down. So I had quit my job because of  
9 the pregnancy, or I would have been. So I wasn't at the  
10 time.

11 Q Okay. Did you ever work for the storehouse or anything  
12 like that?

13 A Yes. I was sewing -- I had a slip business that I had  
14 been running and they asked me to continue it. They would  
15 supply the materials if I would continue doing the labor for  
16 it.

17 Q Okay. Was Helen compensated for her work as a midwife?

18 A I'm not sure how to answer that one. She was working  
19 for the clinic and they were paying her. I don't think it's  
20 anything close to what it should have been. But yes, there  
21 was compensation.

22 Q Do you know whether her pay was docked to go to the  
23 church or whether she had to give up her checks to donate  
24 them to Warren Jeffs?

25 A We were all told to donate at least a thousand dollars

1 a month. So yes, definitely part of that would have gone to  
2 the church.

3 Q Okay. And Vergel lost his job at some point; is that  
4 correct?

5 A Yes. I believe he lost it instantly when we left  
6 because the clients could choose whether or not to dismiss  
7 the people caring for them.

8 Q Okay.

9 MR. HOOLE: I think, Your Honor, on this one, I'll  
10 submit damages by affidavits because there's three of them,  
11 and it will be easier to break it down that way, if that's  
12 okay.

13 THE COURT: That will be fine.

14 BY MR. HOOLE:

15 Q All right. What would have happened if you had not  
16 done the things and provided the labor and services that you  
17 were told to provide as a family, if any one of you had not  
18 done that?

19 A Well, people that weren't complying at that point  
20 weren't making it into the United Order, and a lot of people  
21 were being sent away, a lot of moms without kids. We didn't  
22 really know exactly why, but we knew if we did anything  
23 wrong, we were risking being sent away from our family and  
24 our own children.

25 Q So you were fearful that you'd be separated?

1 A Yes.

2 Q And lose the home you had?

3 A Yes. Everything would be sent away, with no contact to  
4 anyone.

5 Q Basically sent out into a world you didn't know very  
6 well?

7 A That's right.

8 Q Okay.

9 MR. HOOLE: Your Honor, I think that's all I've  
10 got, unless the Court has questions.

11 THE COURT: Do you want to ask of either Vergel or  
12 Carole whether or not they want to --

13 THE WITNESS: Do you want to ask Vergel a few  
14 questions?

15 MR. HOOLE: Yes. Thank you.

16 So, Carole or Vergel -- Vergel first, did you hear  
17 Carole's testimony?

18 MR. VERGEL BARLOW: Yes. I was listening. I have  
19 a little bit of a hard time hearing, but I believe I've got  
20 it.

21 MR. HOOLE: Did you find her testimony to be  
22 accurate?

23 MR. VERGEL BARLOW: Yes.

24 MR. HOOLE: Was there anything you would like to  
25 add or clarify?

1 MR. VERGEL BARLOW: That there's definitely a lot  
2 more detail that was not -- that didn't come out, but  
3 everything that did come out is absolutely accurate for  
4 sure.

5 MR. HOOLE: Right. And I think the Court will be  
6 able to rely on your written submissions to supplement this,  
7 but this gives us a sense of what you went through as a  
8 family.

9 Let me ask Helen the same questions.

10 Helen, can you hear us?

11 It shows she's on speaker.

12 Helen, are you there?

13 MS. HELEN BARLOW: Yes, I'm here. Can you hear me  
14 now?

15 MR. HOOLE: Yes.

16 Were you able to hear Carole and Vergel?

17 MS. HELEN BARLOW: Yes. I heard her well, yes.

18 MR. HOOLE: Do you need to add anything or clarify  
19 anything to her testimony?

20 MS. HELEN BARLOW: Just only as far as income, I  
21 was compensated throughout the years for my services. My  
22 highest pay rate was 11.75 for nursing care and midwifery.  
23 Until about the last six months that I worked there, I  
24 wasn't compensated at all.

25 MR. HOOLE: Until about the last month you



1 received no compensation. Okay.

2 And we'll deal with that in writing to get more  
3 specificity on that.

4 MS. HELEN BARLOW: Otherwise, her testimony was  
5 totally accurate.

6 MR. HOOLE: All right. Thank you. I guess you're  
7 busy, so we'll let you go.

8 THE COURT: Would you ask Helen if --

9 MR. HOOLE: Hold on just a second, Helen.

10 THE COURT: -- even when she was being  
11 compensated, was she required to donate a certain amount to  
12 the priesthood.

13 MR. HOOLE: When you were -- even when you were  
14 compensated 11.75 an hour, did some of that go back to the  
15 priesthood? Did you have to donate some of that?

16 MS. HELEN BARLOW: Yes. All of it was given to  
17 Vergel, and then he paid the required amounts for the  
18 donations that were required.

19 MR. HOOLE: Okay.

20 And, Vergel, do you know what those donations  
21 were?

22 MR. VERGEL BARLOW: Well, for a very long time it  
23 was a thousand dollars a month, and then it went to \$2,000 a  
24 month for elders, and just continued to increase. For you  
25 old members, we were actually required to turn every penny

1 that we got in and then receive back a bare minimum to pay  
2 our bills and expenses. So essentially every penny that  
3 came into our possession, we were required to give to the  
4 priesthood. Just like all of our food, everything. So  
5 literally everything for surviving as a human being, as a  
6 family had to come through the priesthood or we would risk  
7 our families, our future.

8 MR. HOOLE: You were provided a home, correct?

9 MR. VERGEL BARLOW: Yes. We did have a place to  
10 live, yes.

11 MR. HOOLE: Unless you were evicted from your home  
12 by the church?

13 MR. VERGEL BARLOW: Yes. Or if you were sent  
14 away, then you were not allowed to have a place to live  
15 anywhere on any priesthood land and was required to leave  
16 the community, and then very much shunned. So the risks  
17 were definitely very high.

18 MR. HOOLE: Okay. You paid your own utilities?

19 MR. VERGEL BARLOW: Yes.

20 MR. HOOLE: Were you responsible for your own  
21 food?

22 MR. VERGEL BARLOW: Yes. But as you old members,  
23 we had to get everything we consumed from the storehouse.

24 MR. HOOLE: You couldn't go to a grocery store?

25 MR. VERGEL BARLOW: That's correct. If we were

1 seen at a grocery store, then we were risking being called  
2 in and chastised, or worse. Many people did get sent away  
3 for simple things like this.

4 MR. HOOLE: Okay. Thank you.

5 That's all we've got. Thanks.

6 May they be excused, Your Honor?

7 THE COURT: They may.

8 MR. HOOLE: We can proceed with Susie Barlow,  
9 unless the Court wants to take a short break.

10 THE COURT: I believe you have two witnesses left,  
11 correct?

12 MR. HOOLE: I believe so. I'm trying to see the  
13 clock so I know what time it is.

14 We have two witnesses, and then I'll have a brief  
15 closing.

16 THE COURT: Okay. How long do you think that will  
17 take?

18 MR. HOOLE: I think we're going to go to about  
19 1:30.

20 THE COURT: Why don't we take a 15-minute recess  
21 now and we'll come back and finish in that last hour and a  
22 half, all right?

23 MR. HOOLE: Okay. Thank you.

24 (Recess)

25 THE COURT: Go ahead, Mr. Hoole.

1 MR. HOOLE: Plaintiffs call Susan Broadbent.

2 SUSAN BROADBENT,

3 Having been duly sworn, was examined

4 and testified as follows:

5 THE CLERK: Would you state and spell your name,  
6 please.

7 THE WITNESS: Susan Broadbent. S-u-s-a-n,  
8 B-r-o-a-d-b-e-n-t.

9 DIRECT EXAMINATION

10 BY MR. HOOLE:

11 Q Can I call you Susie?

12 A Yeah.

13 Q Susie, were you born and raised in the FLDS?

14 A Yes.

15 Q Have you been able to review the common allegations in  
16 the lawsuit?

17 A Yes.

18 Q And your specific personal allegations?

19 A Yes.

20 Q Are they accurate?

21 A To the best of my knowledge.

22 Q Thank you.

23 Do you remember when Warren Jeffs became known as the  
24 prophet in the community?

25 A Yes.

1 Q Did you support and sustain him as the prophet?

2 A Yes.

3 Q Did you believe he was the prophet?

4 A Yes.

5 Q Did he tell you he was the prophet?

6 A Multiple times.

7 Q And did he conduct himself in the community as if he  
8 was?

9 A Yes.

10 Q Did the people in the community believe that?

11 A Yes.

12 Q And were you obedient to his commands?

13 A Mostly, yes.

14 Q All right. Were the people, to your knowledge,  
15 obedient to what he commanded?

16 A Yes.

17 Q Were you married or directed to be married by the  
18 prophet when you were 16?

19 A Yes.

20 Q How were you notified of this marriage?

21 A I was told I was going to get married, and we got in  
22 the Suburban and went to Caliente and got married.

23 Q And how much time elapsed between being told you were  
24 going to get married and the actual ceremony?

25 A The drive from Hildale --

1 Q The drive to Caliente?

2 A Yep.

3 Q Just the drive to Caliente.

4 And who did you marry?

5 A Leonard Barlow.

6 Q Who's Leonard Barlow?

7 A He is my cousin. My dad and his dad are brothers.

8 Q So he's your first cousin?

9 A Yes.

10 Q And you were 16?

11 A Yes.

12 Q And how old was he when you married him?

13 A He was 35 years older than me.

14 Q So he would have been about 51?

15 A Yeah.

16 Q And did he have other wives?

17 A One.

18 Q And did he have other children with that wife?

19 A Yes.

20 Q Okay. Did you have any children with him?

21 A Miscarriages.

22 Q Miscarriages. Okay.

23 And who performed that marriage?

24 A Warren.

25 Q Would you have entered into that marriage if Warren

1     Jeffs had not commanded you to do so?

2     A     No.

3     Q     Did you know your husband before you married him?

4     A     No.

5     Q     Okay. The night of your marriage, that night, did you  
6     sleep with him in the same room?

7     A     Yes.

8     Q     And did you sleep in the same bed?

9     A     Yes.

10    Q     And did you have any contact with him that night?

11    A     His arm was over my stomach.

12    Q     Okay. And in the morning did you call your mother?

13    A     Yes, and told her that I was going to have a baby now  
14    because I had slept with my husband.

15    Q     Okay. What did your mother say?

16    A     She started explaining about sex, and I hit her, and  
17    she sat down on the chair and called my aunt and had my aunt  
18    come up and talk to me.

19    Q     Did you know what sex was before that?

20    A     No.

21    Q     Was that taught in the community?

22    A     No.

23    Q     So you thought that by having your husband sleep with  
24    you with his arm over you, you were going to be pregnant?

25    A     Yes.

1 Q When you learned what it really took to become  
2 pregnant, how did you feel?

3 A Disgusted.

4 Q Did you want to have children at that point?

5 A No.

6 Q Did you have sexual relations with your husband that  
7 could have produced children after that?

8 A I fought for close to two years.

9 Q You fought the whole thing for close to two years?

10 A Yes.

11 Q At some point did you have sexual relations with him?

12 A Yes.

13 Q When was that?

14 A Before my mother's birthday, the night before  
15 September 1st.

16 Q Why before your mother's birthday?

17 A Because they were punishing her the more that I fought,  
18 and, you know, that just made me more and more mad. So, you  
19 know, I can sacrifice doing -- you know, having sex, but her  
20 being punished was not acceptable to me.

21 Q Was this some kind of a birthday present?

22 A Yeah, and then she slapped me.

23 Q So during these two years or so when you're resisting  
24 relations, what kind of pressure were you under, if any?

25 A We would have to meet with Warren every week, do



1 summaries on scriptures so that -- well, basically, a  
2 nightly review, and write our summaries down, and then  
3 report that week, okay, this is what we did, this was what  
4 we studied, this is what we read.

5 Q And during these sessions -- these weekly sessions with  
6 Warren Jeffs, did you receive instruction on whether or not  
7 to have children?

8 A Yes.

9 Q What did he say?

10 A He commanded me to stop fighting, and have a baby, and  
11 be blessed with a child.

12 Q Did you end up doing that?

13 A I kept telling him no.

14 Q Okay. And these sessions continued?

15 A Yes.

16 Q At one point did you try to run away?

17 A Not away from the Creek, but I did run away up into the  
18 mountains to hide.

19 Q Who were you hiding from?

20 A Well, Warren had called us in for a regular meeting,  
21 but then he took us into a different room. And two of his  
22 brothers were in there also. He pulled out a hide-a-bed and  
23 told us that we're going to consummate the marriage right  
24 here in front of them so that there's witnesses.

25 Q What did you do?

1 A I threatened Warren, and made him back up to the  
2 window, I had a knife against his throat, and cut the  
3 screen, and I disappeared for a few days up in the canyons.

4 Q Did you go out the window?

5 A Yes.

6 Q And you went and hid in the canyons above the  
7 community?

8 A Yes.

9 Q And that's before you eventually submitted and had  
10 sexual relations before your mother's birthday?

11 A Yes.

12 Q Okay. Did you consider those sexual relations to be  
13 consensual or -- did you understand what the word rape  
14 meant?

15 A Not at the time.

16 Q Okay. So now, looking back --

17 A They were rapes.

18 Q They were rapes. Okay.

19 At some point, while you were living in the community,  
20 were you required to work?

21 A Yes.

22 Q What was your first job?

23 A As the youngest when -- the youngest one I can  
24 remember?

25 Q Yeah.

1 A Working in the fields.

2 Q Okay. Was this pecan harvesting?

3 A No.

4 Q What were you doing in the fields?

5 A Tomatoes, sugarcane, beets, carrots. I worked with  
6 Grandpa Joe Jessop.

7 Q Was this a family garden?

8 A The community garden.

9 Q Was for the whole community?

10 A Uh-huh. (Affirmative)

11 Q Were you paid for that?

12 A No, but I stole food off of them.

13 Q Okay. What was your next job?

14 A I worked at -- after I got married, I worked at the  
15 hardware store and the clinic -- the Hildale clinic. I was  
16 an errand girl.

17 Q At the hardware store, were you paid?

18 A Yes.

19 Q How much were you paid an hour, if you know?

20 A It was minimum wage.

21 Q 7.25?

22 A Sounds about right.

23 Q Were you able to keep your checks?

24 A I was required to pay the power bill for the whole  
25 house, and then the rest of the money had to go to Leonard.

1 Q It went to your husband Leonard?

2 A Yes.

3 Q And what was the purpose of giving it to him?

4 A Because he had to pay the thousand dollars a month.

5 Q To the prophet?

6 A Yeah.

7 Q So your money went back to the prophet?

8 A Yes.

9 Q Did you have any choice in that?

10 A No.

11 Q What would have happened if you had said no?

12 A They probably would have cut my rations again, you  
13 know, some kind of a punishment.

14 Q What was your next job after the hardware store?

15 A I worked for Hildale as an errand girl.

16 Q At Hildale clinic?

17 A Yes.

18 Q Okay.

19 A And then I helped teach first grade. I helped Louisa  
20 teach first grade.

21 Q Let's go back to Hildale clinic for just a minute.

22 Were you paid at Hildale clinic?

23 A Yes.

24 Q Did you receive checks in your own name?

25 A Yes.

1 Q Were you able to keep that money?

2 A No.

3 Q What happened to that money?

4 A I gave it to Leonard, and he saved up until he bought a  
5 new car in my name.

6 Q Did that also go to pay power bills or was it just for  
7 this new car?

8 A Both.

9 Q Okay. But you personally weren't able to keep it?

10 A No.

11 Q But the money it seems like stayed within the home?

12 A Yes.

13 Q In that it paid power bills and purchased a car for the  
14 family?

15 A And then the rest went to the donation.

16 Q So anything above that would have gone back to the  
17 church. Do you know how much of that was actually funneled  
18 back to the church?

19 A I have no clue.

20 Q Do you know what you were paid at Hildale clinic by the  
21 hour?

22 A Minimum wage.

23 Q Would that have been 7.25?

24 A Yes.

25 Q Other than those jobs -- well, you talked about

1 teaching first grade. Tell me about that.

2 A I was just a teacher's assistant. So, you know, go  
3 copy papers, and, you know, watch kids out on the  
4 playground. So I was just a helper.

5 Q Was that at a church school.

6 A Yes.

7 Q And how long did you do that?

8 A Just the one year.

9 Q Were you paid for that?

10 A No.

11 Q During that year when you weren't paid, how many hours  
12 were you working a week?

13 A I don't know. I'd get there at 8:00 and leave after  
14 getting done and getting ready for the next day.

15 Q So you were there for the entire school day?

16 A Yes.

17 Q Okay. Was that five days a week?

18 A Yes.

19 Q Did you work on weekends?

20 A Not at the school, no.

21 Q What else did you do on weekends, what kind of work?

22 A Sometimes I tried to help my mom at the thrift store,  
23 and basically just kind of tried to relax. But you know how  
24 that is with kids, you never can.

25 Q During this time after your marriage, were you living

1 in Utah or Arizona?

2 A Arizona.

3 Q Arizona -- you were married in Nevada and taken to  
4 Arizona where you lived with Leonard, correct?

5 A Yes.

6 Q Did you live with Leonard the whole time in Arizona?

7 A Yes.

8 Q But you'd come back into Utah to work at the clinic,  
9 for example?

10 A Yes.

11 Q Where was the school? Was that in Arizona or Utah?

12 A No. It was in Arizona. Just barely over the creek, on  
13 the other side of the church building.

14 Q Okay. The field -- the community garden, was that in  
15 Utah?

16 A I don't know. I think it's right on the border.

17 Q Okay. The gift shop, where was that located?

18 A What gift shop?

19 Q I thought you mentioned a gift shop.

20 Oh, the hardware store. That's in Arizona, correct?

21 A Yes.

22 Q Was there another kind of store you worked for?

23 A The storehouse.

24 Q Oh, the storehouse. And that was in Utah; is that  
25 correct?

1 A Yes.

2 Q Okay. So you were going back and forth between Arizona  
3 and Utah and Nevada for purposes of your illegal marriage  
4 and also your working; is that right?

5 A Yes.

6 Q Okay. Were you ever legally married to Leonard?

7 A No.

8 Q Because he already had a wife?

9 A Yes.

10 Q He was your first cousin and he was 35 years older?

11 A Uh-huh. (Affirmative)

12 Q Did you have responsibilities in the home with respect  
13 to the children?

14 A Yes. It was my job to take care of them, feed them,  
15 cloth them. Basically just -- well, jump in and all of a  
16 sudden be a mom.

17 Q And what were their -- did you say there were 11 of  
18 them or did I ask you? Were there 11?

19 A Yes.

20 Q Were any of the children that you were their mother to,  
21 their sister mother, were any of them older than you?

22 A Four.

23 Q Four of them. Okay.

24 Were you still considered their mother?

25 A Yes.



1 Q And how many hours a day would you help, on an average  
2 day, with taking care of those children during your  
3 marriage? Can you give us an estimate?

4 A Twenty-four hours a day.

5 Q Well, you're going to be sleeping some of the time,  
6 right?

7 A Yeah. They would come climb in bed with me, you know.  
8 If they had a bad dream, I got up with them, you know.  
9 That's a difficult question to answer --

10 Q Yes, it is. I know. I recognize that.

11 A -- with kids.

12 Q Basically the hours of a full-time parent with 11  
13 children?

14 A Yes.

15 Q Now their actual biological mother, was she there as  
16 well?

17 A On and off.

18 Q On and off. Explain that.

19 A She would get upset and leave for days on end, didn't  
20 know where she was, and show up mad, and then disappear  
21 again.

22 Q Were you the primary caregiver during the years that  
23 you were married to Leonard?

24 A Yes.

25 Q Okay. And at some point did you leave the community?

1 A For what reason?

2 Q Did you leave the group? Did you decide to escape?

3 A I wanted to go on a camping trip with Miles, and he  
4 came and got me, and he didn't go on the camping trip with  
5 the rest of people. He went up past Salt Lake, northern  
6 part of Utah.

7 Q Okay. And did that end up in you being able to leave?

8 A No.

9 Q How did you actually leave?

10 A They put me in a repentant house down in Mesquite,  
11 Nevada, and told me that I'm not supposed to leave the  
12 house, and I'm supposed to read so many chapters, and I was  
13 like no. So I would sneak off and bum a ride up to  
14 St. George, and I went to that Dixie College and got my GED  
15 without them knowing.

16 Q Right. And so you basically were able to get away?

17 A Yeah. After I got my GED, then this helped me get to  
18 Job Corps.

19 Q And what year was it that you were able to get away  
20 from Mesquite and come to St. George?

21 A I don't remember the exact year. I was 21.

22 Q Okay. Married at 16. You're out at 21?

23 A Yes.

24 Q Okay. During this period of time did you continue to  
25 believe that Warren Jeffs was your prophet?

1 A Yes.

2 Q When, if ever, did you stop believing that?

3 A When he started torturing my mother, that's when it  
4 started, you know, clicking in my head, hey, this is wrong.

5 Q How did he torture your mother?

6 A He told Uncle Fred, which was whom my mom was assigned  
7 to, to make her eat steak right after she had got a surgery,  
8 a tummy tuck surgery. So you're supposed to wait -- you  
9 know, there's rolls and stuff right after you have that  
10 surgery. So he made her eat the steak, and it would be so  
11 painful watching her because she would swallow it and throw  
12 it up, and swallow it and throw it up.

13 Q Who was making her do this?

14 A Uncle Fred.

15 Q Uncle Fred.

16 A Yeah.

17 Q Okay.

18 A He told me this is because you are fighting the  
19 prophet.

20 Q And that made you start questioning the prophet?

21 A Yes.

22 Q Why would something that Uncle Fred did make you  
23 question the prophet?

24 A Because he said that he was commanded to punish my mom.

25 Q When is the last time you saw your mother?

1 A I was 19 when she left for Zion.

2 Q So she left for Zion. And do you know where Zion was?

3 A No.

4 Q Perhaps Texas?

5 A I don't know. She just disappeared.

6 Q Okay. That can be different places; is that correct?

7 A Yes.

8 Q And did you have any contact after she left for Zion?

9 A I tried to write letters to her, but she would never  
10 answer. I don't think -- now thinking back on it, I don't  
11 think they were giving them to her.

12 Q Okay. At some point did your mother pass away?

13 A Yes.

14 Q Can you tell us your understanding of the circumstances  
15 of her death?

16 A Well, my little brother Allen had left the Creek also.  
17 About three years ago he got a phone call from some law  
18 enforcement guy saying that my mom had left a note on the  
19 bedside table to call these two numbers, and one was Allen's  
20 and one was my old cell phone. So they did, but couldn't  
21 get ahold of me, so Allen called me.

22 She was, I guess, sick, some kind of a cancer or  
23 something, and they put her in a house by herself and gave  
24 her a few plants to see if she could grow her own food, and  
25 she couldn't go outside. I think they basically just

1 starved her to death until she passed.

2 And then some random person walking down the street  
3 smelled death. So they had the police come do a well check,  
4 or something, however they do that, and found her body. And  
5 she was so bloated from all the gas and stuff, decaying  
6 body, that they had to deflate her in order to get her out  
7 the door.

8 Q Do you know what happened to her body? After she was  
9 removed, do you know what happened to her remains?

10 A They were going to bury her in that same town, but --

11 Q In Short Creek?

12 A No. It was in some different state.

13 Q Okay.

14 A My brother Justin, he is a mortician for the Creek, and  
15 he showed up and deflated the body real good, and then  
16 disappeared with her.

17 Q So he took the body and left?

18 A Yes.

19 Q Do you know where she is buried at this point?

20 A No.

21 Q After leaving the community, have you sought any kind  
22 of therapy or mental health care?

23 A Yes.

24 Q And have they given you any diagnoses?

25 A Severe PTSD.

1 Q Okay. Have they addressed with you your ability to  
2 show emotion?

3 A Yes.

4 Q What is the situation with that issue, as you  
5 understand it?

6 A My group lead -- it's not my therapist, but the group  
7 lead is -- well, it's kind of like a ten-step program where  
8 you realize an emotion, and you basically train yourself to  
9 feel it, and then explain that emotion. So I'm in that  
10 class. And then I have a regular therapist. And then I  
11 have a doctor for my anxiety and panic attack pills. And  
12 then I have a family doctor too, a psychiatrist.

13 Q So are you learning how to feel and express emotion?

14 A I'm trying to.

15 Q Were you able to express and feel emotion as a child?

16 A No.

17 Q You never have been?

18 A No.

19 Q Even before your marriage?

20 A Yes.

21 Q Okay. The work you did, did you have any choice in  
22 doing the work that you were told to do for the benefit of  
23 the prophet?

24 A No. If I said no, then I would get punished somehow.  
25 So it wasn't worth it.

1 Q And you believed that he was the prophet, correct?

2 A Yes.

3 Q Do you believe that now?

4 A No.

5 MR. HOOLE: Your Honor, I think that's all I've  
6 got.

7 THE COURT: Thank you. You may step down.

8 MR. HOOLE: Janetta Jessop.

9 JANETTA JESSOP,

10 Having been duly sworn, was examined

11 and testified as follows:

12 THE CLERK: Would you state and spell your name,  
13 please.

14 THE WITNESS: Janetta Jessop. J-a-n-e-t-t-a,  
15 J-e-s-s-o-p.

16 DIRECT EXAMINATION

17 BY MR. HOOLE:

18 Q Good afternoon, Janetta.

19 A Hi.

20 Q You doing okay?

21 A Yeah.

22 Q Were you able to read the common allegations in the  
23 lawsuit?

24 A I was.

25 Q Are they accurate?

1 A Yes.

2 Q Were you able to read your individual allegations as  
3 summarized in the lawsuit?

4 A Yes.

5 Q And were those accurate as well?

6 A Correct.

7 Q Okay. Were you born in Short Creek?

8 A Yes.

9 Q And were you from a multigenerational family of people  
10 who had lived in that community?

11 A Yes.

12 Q Do you remember Warren Jeffs becoming the leader of the  
13 FLDS?

14 A Yes.

15 Q Did you accept him as the leader?

16 A I did.

17 Q And why did you accept him as the leader?

18 A I had my doubts because of things he had said in  
19 church, you know, after his father had passed. But at the  
20 time it seemed like, you know -- because he would get up in  
21 church and he'd say -- well, his father basically had  
22 trained the people that Warren spoke for him before his  
23 passing. So that's kind of what I went on with.

24 Q Okay. So you had some doubts?

25 A Yes.



1 Q At some point did you fully accept him?

2 A Yes.

3 Q And you believed he was the prophet?

4 A Correct.

5 Q Were you present in a meeting where 21 men were asked  
6 to stand up?

7 A Yes.

8 Q What happened when they were asked to stand up?

9 A He told them they're all, you know, evil basically, and  
10 that he was telling them to leave.

11 Q Was this sometime soon after he became the official  
12 prophet?

13 A Yes.

14 Q And the 21 men, did he identify those men as master  
15 deceivers?

16 A Yes.

17 Q Were these men of some prominence in the community?

18 A Very much so.

19 Q People who had had power and positions of authority  
20 prior to that?

21 A I believe he saw them as a threat, but yes.

22 Q Okay. Did he, when these men were standing in the  
23 congregation, ask the congregation to vote on whether or not  
24 they should be expelled?

25 A Yes.

1 Q And did the 21 men vote for or against being expelled?

2 A I do not know that answer.

3 Q You don't remember that?

4 A No.

5 THE COURT: How old were you at this time, when  
6 that meeting took place?

7 THE WITNESS: About 16, I believe, if I remember  
8 correctly.

9 BY MR. HOOLE:

10 Q Was it before or after you were married?

11 A That's where it gets a little fuzzy.

12 Q Okay. Were you married at 16?

13 A Yes. Barely, but yes.

14 Q Do you know whether these men actually left the  
15 community and left their families?

16 A Sorry. Say that again.

17 Q Do you know whether the men actually left the community  
18 after that meeting?

19 A As far as I know, yes.

20 Q Okay. And they were removed from their families?

21 A Yes.

22 Q Do you know what happened, generally, to their families  
23 after that?

24 A I do not.

25 Q Do you know whether any of those wives were reassigned

1 to other men and the children reassigned to other fathers?

2 A I do not.

3 Q Okay. Let's just focus on you for a minute, then.

4 You're in the community. You see these 21 men sent away.

5 Did that cause fear for you as an individual in terms of

6 what could happen under Warren Jeffs?

7 A Yes.

8 Q Do you have a sense of whether the community felt fear?

9 A Definitely, yes.

10 Q Okay. Was it something you talked about with other  
11 people in the community?

12 A No.

13 Q But it was still felt?

14 A Yes.

15 Q Okay. So after that, did you think it would be  
16 dangerous to contradict what the prophet said?

17 A Very much so.

18 Q Because you might be sent away yourself, or your  
19 parents, or something?

20 A Yes.

21 Q Okay. So when you were 16, were you assigned to be in  
22 a marriage?

23 A Yes.

24 Q And who were you assigned to marry?

25 A Warren Steed Jeffs.

1 Q So you were assigned to marry the prophet?

2 A Yes.

3 Q How long after you learned that you would marry the  
4 prophet did the actual marriage take place?

5 A I had an appointment with the prophet. I went in with  
6 my father, and he asked me right there on the spot if I  
7 would marry him. I told him yes. And we got married right  
8 there, in Hildale, in his home -- in his brother's home.

9 Q And was that in Utah?

10 A Yes.

11 Q Okay. And he had a number of other wives at this  
12 point?

13 A Yes.

14 Q What number were you?

15 A Sixty-three.

16 Q Okay. It was not a legal marriage?

17 A No.

18 Q Do you think you could have said no?

19 A No.

20 Q Did you even think of saying no?

21 A Yes.

22 Q You did?

23 A Yes.

24 Q Why didn't you say no?

25 A I was afraid of the consequences. I didn't want to

1 dishonor my family, my father in particular. I was afraid  
2 of what they would do to my family. I was afraid they'd  
3 take my father's family away if I said no.

4 Q At that point did you end up staying with the prophet's  
5 family after the marriage?

6 A Yes.

7 Q Okay. I understand that you were allowed to go home  
8 and get some things?

9 A Yes.

10 Q And you left all the things that a child would have  
11 behind; is that correct?

12 A Yes.

13 Q You just brought what you would need to be a wife of  
14 the prophet?

15 A Correct.

16 Q What did you bring with you?

17 A CDs, books, a hope chest. I was allowed to keep some  
18 clothes. That was about it.

19 Q What were the CDs?

20 A They are -- they were just of music that our people  
21 make themselves.

22 Q Do they contain religious music?

23 A Yes.

24 Q And sermons?

25 A Yes.

1 Q Did you have a CD from the Beach Boys, or anything like  
2 that?

3 A No.

4 Q It was all church approved?

5 A What?

6 Q It was all church approved material?

7 A Yes.

8 Q Were you able to access any kind of media, news, radio,  
9 television, Internet?

10 A No.

11 Q Why not?

12 A No.

13 Q Why couldn't you access that?

14 A We weren't allowed to have Internet, or laptops, or  
15 computers, or TVs. We weren't supposed to read the  
16 newspapers. So basically we were shut off from all the  
17 outside worldly things.

18 Q Did your family have a television?

19 A No. We would borrow one from a family we knew  
20 sometimes.

21 Q Was that breaking the rules?

22 A Yes.

23 Q Okay. Did you have a driver's license?

24 A At 16, no. I did not get mine until I was 17, or 18.  
25 I don't remember.

1 Q When you had a driver's license, did you drive a car?

2 A Yes.

3 Q Did you ever turn on the radio?

4 A I wasn't supposed to. I did sometimes if I was by  
5 myself.

6 Q Okay. Did you listen to the news on the radio?

7 A No.

8 Q Okay. So would it be accurate to say that all the  
9 information that you were provided came from within the  
10 church?

11 A Correct.

12 Q And things outside the church were excluded from your  
13 access?

14 A Right.

15 Q And that's because Warren Jeffs told you to just limit  
16 your information to what he wanted?

17 A He didn't exactly tell it like that, but yes.

18 Q How did you get that understanding?

19 A Well, you basically don't ask questions and do what  
20 you're told. And if you don't, then there's going to be  
21 consequences, or blackmail of some kind.

22 Q Okay. Growing up in the community were you taught  
23 anything about how to treat boys?

24 A We were taught as young girls that boys are snakes and  
25 we don't think about them, we don't look at them, we don't

1 associate with them at all.

2 Q Were you taught anything about how to make babies?

3 A No.

4 Q Soon after you were married, did the prophet call you  
5 into his bedroom?

6 A Yes.

7 Q Can you tell the Court what happened?

8 A He put me on the phone with my sister Kate, who had  
9 gone to Zion -- I didn't know what that meant at the time --  
10 and I think it was his way of encouraging me to do exactly  
11 as I was told, you know, be a good wife, and then I can go  
12 to Zion. Of course it was very confusing. But I think that  
13 was what he was trying to do.

14 Q And you mentioned Kate. Was she a wife of the prophet  
15 as well?

16 A Yes.

17 Q So continue.

18 A After that, he disappeared and I didn't see him for  
19 about three months.

20 Q Did he have you undress?

21 A Not then, no.

22 Q Not then. Okay. I may be confusing it with another  
23 time.

24 Was there a time when he had you undress and there was  
25 sexual contact?



1 A Yes.

2 Q Okay. Were you required to move around to different  
3 places and different states as part of his family?

4 A Yes.

5 Q Why was that, do you know?

6 A When he sent me to Zion, I went to Colorado to be with  
7 his family there.

8 Q Was it in Colorado that you were assigned the job to  
9 kill turkeys and pheasants?

10 A No. That was in Short Creek.

11 Q Was that in Short Creek?

12 Let's talk about that for a minute. Was that a job  
13 that you were given?

14 A Yes.

15 Q And what was your understanding of why you needed to  
16 kill those animals?

17 A He said it was for Zion.

18 Q And what would you do with the animals? I mean did  
19 you -- you bottled the meat?

20 A Yes.

21 Q And was that for your own family?

22 A No.

23 Q Who was it for?

24 A For everyone who qualified for Zion.

25 Q So you understood that the meat you were bottling was

1 going to go to feed the people in Zion?

2 A Correct.

3 Q And that was part of Warren Jeffs' scheme to make sure  
4 that they had some food; is that right?

5 A Yes.

6 Q So you were providing that service for his benefit?

7 A Yes.

8 Q And were you paid for that at all?

9 A No.

10 Q How long were you doing those kinds of things,  
11 killing -- I think it was turkeys, chickens, and pheasants?

12 A Yes, that's right. Well, there was a time period in  
13 the -- about the year, year and a half that I was in hiding  
14 when that took place.

15 Q Okay.

16 A Whenever that needed to be done, we'd do it.

17 Q So it wasn't every day?

18 A No.

19 Q Okay. And that was one of the jobs you did that you  
20 weren't paid for?

21 A Right. Yes.

22 Q Okay. Were you required to listen to his sermons?

23 A Yes.

24 Q Tell us about that. How did that happen?

25 A Well, when his family was in hiding, we were required

1 to listen to it nonstop, his sermons or his voice on tape,  
2 all day, every day, aside from the hour that we called --  
3 well, the hour of prayer. So every hour -- on the hour  
4 every hour we prayed for his deliverance.

5 Q This is when he was in prison?

6 A No. It's when he was in hiding.

7 Q Oh, when he was in hiding. I see. Okay.

8 And were his sermons played over a broadcast system in  
9 the home?

10 A Yes.

11 Q So you could hear it wherever you went?

12 A Right.

13 Q Okay. So were you moved to different houses of hiding?

14 A Yes.

15 Q And as part of moving around to these places, were you  
16 receiving any kind of training from him?

17 A Yes.

18 Q What kind of training?

19 A He called it the law of Sarah. I understood it to be  
20 like being pure, like submitting to your husband mind, body,  
21 and soul. But that's not -- I found out later that's not  
22 what that was.

23 Q Was there something called the higher law of Sarah?

24 A Yes.

25 Q Did you learn what that meant?

1 A Yes.

2 Q What did that mean?

3 A That meant sexual relations with your sister wives,  
4 helping each other, pleasuring each other for his benefit --  
5 or for him to watch.

6 Q Okay. Was that something that took place in front of  
7 him, or was he on the phone, or how did that --

8 A Both, either one, whichever he was available for.

9 Q At some point were you selected to be worthy enough to  
10 go to Zion?

11 A I was.

12 Q Were all his wives allowed to go to Zion?

13 A No.

14 Q When was that, do you recall?

15 A It was -- let's see -- two months after I married him.  
16 So that had to have been December of '03.

17 Q December of '08?

18 A '03.

19 Q Of '03. Okay. And I think your allegation says  
20 November of '03, in that time period?

21 A Right.

22 Q Okay. Some wives were left behind?

23 A Yes.

24 Q And some wives were allowed to go?

25 A Right.

1 Q What about the children of these women?

2 A When he had the revelation of -- when I was called to  
3 Zion, there were six other women -- there were five other  
4 women, six total, and then he said that God had said that  
5 all of his children under the age of eight were to go with  
6 us at the time.

7 Q Did some of the women -- were they separated from their  
8 children?

9 A Yes.

10 Q So some of the children were called to go to Zion with  
11 some of the women and some the mothers stayed behind without  
12 their children?

13 A Right.

14 Q Okay. Was that difficult to witness?

15 A Very much.

16 Q Did that cause you to doubt?

17 A Yes.

18 Q Did you at this point still believe he was the prophet?

19 A Everything was so confusing it was really hard to know.  
20 I honestly didn't -- I was afraid to doubt. I was afraid to  
21 even think for myself.

22 Q Had you been taught not to question?

23 A Right.

24 Q And who had taught you that?

25 A The prophets. Warren to be specific.

1 Q So if a doubt crept into your mind, what would you do?  
2 What should you have done? I mean what would he want you to  
3 do?

4 A Push it out of my mind and think of something else.

5 Q Did you try to do that?

6 A Yes.

7 Q So when doubts came, you tried to get rid of them?

8 A Yes.

9 Q Do you remember arriving at a house in hiding somewhere  
10 in the mountains?

11 A Yes.

12 Q Snow on the ground?

13 A Yes.

14 Q Do you know where that was?

15 A At the time, no.

16 Q Did you later find out where it was?

17 A Yes.

18 Q Was that Mancos, Colorado?

19 A Yes.

20 Q Just right outside of Durango?

21 A Yes.

22 Q And do you remember going into a home there on the  
23 compound?

24 A I do.

25 Q What did you see when you went in?

1 A I saw a young girl who looked like she couldn't be more  
2 than 12, 13 years old holding a baby on her hip.

3 Q What did that mean to you?

4 A I couldn't believe it. I was shocked. I thought  
5 there's no way. It made me sick to my stomach.

6 Q Did you understand that that was her child?

7 A I did not know, but I assumed. Until I found out later  
8 it was not hers at the time.

9 Q It was or was not?

10 A It was not. But he introduced her as his new wifey, as  
11 he called her.

12 Q Wifey?

13 A Yes.

14 Q Okay. So you don't know whether he had children with  
15 her or when?

16 A I do not.

17 Q Okay.

18 THE COURT: Is this the place that you were told  
19 was Zion?

20 THE WITNESS: Yes.

21 BY MR. HOOLE:

22 Q Was Zion sort of a progressive concept, ultimately  
23 going to Texas?

24 A Can you rephrase that? I don't know --

25 Q Let me see if I can do it this way. In order to go to

1 Zion, did you have to go through certain trainings?

2 A Yes.

3 Q And while you're going through those trainings, are you  
4 moved from one house of hiding to another?

5 A Not because of the trainings. It's more like to keep  
6 officials, FBI, like that they're afraid of finding his  
7 location. It was more to keep them guessing where he was  
8 at.

9 Q Okay. Did you have an understanding when you were in  
10 Colorado of where Zion was or did you think you were in  
11 Zion?

12 A I was taught that, you know -- you know, we didn't know  
13 what Zion meant exactly. Only that if you're pure and good  
14 enough, you can go there. And that's where the elite will  
15 be gathered, you know, in the end of the world, or whatever.

16 Q Based on your knowledge now, do you have an idea where  
17 Zion was?

18 A Well, yes.

19 Q Would that have been Texas?

20 A One of them, yes.

21 Q And that's where they built the temple, right?

22 A Right.

23 Q Okay. In Colorado was there enough room for you and  
24 these other ladies to stay in the home?

25 A No.



1 Q Where did you sleep?

2 A There was a building about 80 feet from the house in  
3 the back, what they called the barn, and it wasn't finished,  
4 so they put like three of the mothers and all of the  
5 children in the loft, because it was warmer.

6 Q Was there straw up there?

7 A No.

8 Q It wasn't that kind of barn?

9 A No. No. It was just finished up there.

10 Q But that was to stay warm, I suppose?

11 A Yes.

12 Q Did you have any particular work assigned to you in  
13 Colorado?

14 A I was over the children mostly.

15 Q How many children are we talking about?

16 A Between 13 and 20.

17 Q And so you were providing like a -- you were just  
18 taking care of them?

19 A Yes.

20 Q And how many hours a day did you do that?

21 A For the most part I was over the kids. If I wasn't, I  
22 was making meals for the men. But it was kind of a 24/7  
23 thing. It never stopped.

24 Q Were you compensated for any of that?

25 A No.

1 Q You didn't have your own children at this point?

2 A No.

3 Q But you had a place to live in this barn, right?

4 A Right.

5 Q Did you have to pay utilities?

6 A No.

7 Q Did you have enough food to eat?

8 A We did.

9 Q Okay. Did you receive any kind of compensation or  
10 spending money, anything like that?

11 A No.

12 Q So if you wanted to go into town and do something, you  
13 couldn't?

14 A Absolutely not.

15 Q At some point, in Colorado, did Warren Jeffs call you  
16 into a room?

17 A Yes.

18 Q Did he ask you to undress?

19 A Yes.

20 Q And did sexual activity follow that?

21 A Yes.

22 Q Did something happen during that event that caused him  
23 to kind of turn on you?

24 A Yes.

25 Q And discipline you?

1 A Yes.

2 Q What was the discipline?

3 A After he got finished, he told me that I was immoral  
4 and that God said I needed to repent, and he sent me back to  
5 a house of hiding in the Creek.

6 Q Okay. Where were you sent?

7 A At the time I was sent back to Rulon Jeffs' compound.

8 Q And that would have been Utah?

9 A Yes.

10 Q So are you still believing he's the prophet at this  
11 point?

12 A No.

13 Q Have you decided he's not the prophet?

14 A Yes.

15 Q Okay. So what's your plan now? What do you want to  
16 do?

17 A Well, I'm trying to raise my kids and --

18 Q No. No. I mean at that time when you're sent back to  
19 Rulon Jeffs' house in Utah.

20 A Okay. I gotcha.

21 Q Were you looking for a way out, or what were you  
22 thinking?

23 A I was continually looking for a way out, but at that  
24 time I hadn't found it yet.

25 Q Were you suffering emotionally?

1 A Yes.

2 Q Would you explain that, what you were feeling and going  
3 through?

4 A Well, I was extremely confused. I wasn't allowed to  
5 ask questions. I had two sisters married to the same man,  
6 but I couldn't go to them. I was just fearful of  
7 everything, and my emotions were all over the place and  
8 everything I felt I had to stuff down. You don't know  
9 what's going to happen to you if you ask any questions. So  
10 you just -- if you feel anything that's your own, that's  
11 scary. That scares you. And emotionally I was drowning.

12 Q Could you continue that way?

13 A No.

14 THE COURT: How old were you at this time?

15 THE WITNESS: Sixteen.

16 THE COURT: So this happened, that you were sent  
17 to Colorado and then sent back to Utah, all while you were  
18 16?

19 THE WITNESS: Yes.

20 BY MR. HOOLE:

21 Q And you couldn't continue that way?

22 A Yes.

23 Q What were you able to do or try to do to address this  
24 situation you were in?

25 A Well, I had finally -- there was a time period where

1 I -- I stopped being able to eat. I couldn't think  
2 straight. I would cry all day. And I just stopped being  
3 able to function at all. I decided, after about three or  
4 four days of this, that I had to do something. I just -- I  
5 was at the end my rope. The only thing I could think of is  
6 to use the phone because that's like the one no-no. You do  
7 not do that.

8 Q Were you allowed to contact anybody?

9 A No.

10 Q So you couldn't use the phone?

11 A No. They were afraid of the authorities finding  
12 Warren's location again. So that's a -- you don't do that.

13 So I used the phone. I called my mom. They hadn't  
14 heard from me in a year at that point. So I just asked her,  
15 you know, how they're doing, and very vague questions  
16 obviously because I was afraid to tell her where I was,  
17 anything like that, you know. And then I called my sister  
18 right after that. She had left the religion, but she still  
19 lived in town.

20 Q Town being Short Creek?

21 A Yes.

22 Q And just to clarify, you're in the compound known as  
23 the Jeffs Block?

24 A Right.

25 Q And it has a big wall around the whole thing, right?

1 A Yes.

2 Q Okay. Continue.

3 A So I called her because she had left the religion but  
4 was still in the community, so she was close. My intention  
5 was to tell her where I was and to help me get out. But no  
6 sooner I had -- my exact words were I am somewhere I don't  
7 want to be, and then I had to hang up because one of the  
8 sister wives was -- I heard someone coming, so I hung up the  
9 phone.

10 Q Were you caught using the phone?

11 A Yes.

12 Q What did this sister wife say to you?

13 A She told me that if I didn't tell Warren, then she was  
14 going to.

15 Q Did you end up telling Warren?

16 A Yes.

17 Q And did that result in more punishment for you?

18 A Yes.

19 Q So you are on the phone with your sister who lives in  
20 the community but she's out of the church?

21 A Right.

22 Q You're trying to get help?

23 A Yes.

24 Q And you're just at the point to try and tell her where  
25 you are?

1 A Right.

2 Q And you're interrupted by the sister wife?

3 A Yes.

4 Q So your sister, was that Susie?

5 A Yes.

6 Q Susie didn't know where you were, but sensed you were  
7 close. Is that a fair conclusion?

8 A She knew I was in trouble, yes.

9 Q Okay. Do you know what she did?

10 A I didn't at the time.

11 Q Do you know whether or not a year earlier when you  
12 disappeared, do you know whether or not she filed a missing  
13 person report?

14 A I didn't know at the time.

15 Q Do you know that now?

16 A Yes.

17 Q Okay. Do you know now that she contacted DCFS, or  
18 Child Protective Services, after she received your call?

19 A Yes.

20 Q And tried to get them involved?

21 A Right.

22 Q Okay. What happened next after that?

23 A Warren told me that the next day someone would be  
24 asking me questions, and that if I told them -- if I got him  
25 in trouble in any way or told them what they wanted to hear,

1 then I would be sent to Child Protective Services.

2 So when it came down to the questioning, I answered all  
3 their simple questions. And then they would ask me a  
4 serious question, and I would tell them I was not going to  
5 answer that.

6 Q And who was questioning you? Was it Child Protective  
7 Services?

8 A Yes.

9 Q Was this the Children's Justice Center?

10 A Yes.

11 Q In St. George?

12 A Yes.

13 Q But you're not answering their questions?

14 A Right.

15 Q It sounds like you're not lying to them, you're just  
16 saying I'm not going to answer?

17 A Right.

18 Q Okay. Did their investigation continue, to your  
19 knowledge?

20 A Yes.

21 Q Where did you go? Were you able to go -- were you able  
22 to leave at that point?

23 A No.

24 Q Were you sent somewhere?

25 A Well, back to my father's home.



1 Q And at this point in time your father is still faithful  
2 to Warren Jeffs?

3 A Right.

4 Q And your mother as well?

5 A Yes.

6 Q Your whole family?

7 A The ones that were still in, yes.

8 Q The ones that were still in.

9 So you're sent back. Did DCFS ever get you out of that  
10 situation?

11 A No.

12 Q They were stymied in their efforts?

13 A Yes.

14 Q Because Warren Jeffs told you not to say anything?

15 A Right.

16 Q And you did what he told you?

17 A Yes.

18 Q And you did that even though you didn't believe he was  
19 the prophet?

20 A Sorry. Say that again.

21 Q When you told DCFS that you didn't want to talk about  
22 things, were you believing that Warren was the prophet at  
23 that point or not believing?

24 A I had been trying to get out because to me it wasn't  
25 about whether he was the prophet or not at that point. I

1 knew that I could not live like that anymore. I could not  
2 function like that.

3 Q Regardless of whether or not he was the prophet or not?

4 A Right.

5 Q You just couldn't be there any longer?

6 A Yes.

7 Q Okay. I get it.

8 Back in the community what happened to you?

9 A You mean what happened next is what you're asking?

10 Q Well, you're still locked in the community, right?

11 A Right.

12 Q Are you working? Are they sending you to work?

13 A Gotcha. Okay. After the phone call where I tell  
14 Warren that I used the phone, I was sent back to my father's  
15 home. He told me about DCFS and what not to do. And he  
16 then told me I was divorced from him, I had to repent, and  
17 then I could remarry him. So I was sent back to my dad's  
18 house, and I was sent to work at the Hildale clinic.

19 Q What did you do at the Hildale clinic?

20 A I took insurance, so people's insurance. Watched the  
21 people in the main room, things like that.

22 Q Did the Hildale clinic basically serve members of the  
23 FLDS?

24 A Yes.

25 Q And when you say you took their insurance, are you

1 talking about the Medicaid and Medicare?

2 A Correct.

3 Q Did you ever take private insurance?

4 A No.

5 Q So all the medical coverage was paid for by the  
6 government?

7 A Yes.

8 Q Okay. Were you also a patient at the clinic while you  
9 were working there?

10 A I was.

11 Q Were they prescribing you medications?

12 A Yes.

13 Q What did they prescribe you?

14 A Well, they were changing my medications every week to  
15 every two weeks. You name it, they had me on it. But the  
16 last ones they had me on, I was on Seroquel and lithium.

17 Q Lithium?

18 A Yes.

19 Q Did that have an effect on you?

20 A Yes.

21 Q What kind of effect did it have?

22 A I felt like a zombie. I couldn't think straight. I  
23 would catch myself drooling. I was extremely tired. I was  
24 surprised I was able to --

25 Q Did the medication help you or hurt you?

1 A It hurt me.

2 Q Do you believe that that was given for the purpose of  
3 keeping you a zombie?

4 A I believe it was to control me.

5 Q Did you act out?

6 A Yes, I did.

7 Q What did you do?

8 A I tried to run away multiple times. The FLDS police  
9 kept bringing me back. And at the time -- when I worked at  
10 the clinic, Warren kind of had Mariam Holm and Lehi Barlow  
11 over me, to kind of keep an eye on me, keep me on the right  
12 track, those kinds of things.

13 Q They were your priesthood leaders?

14 A Yes.

15 Q And was your father your priesthood leader?

16 A Well, my father was my priesthood leader, but Lehi  
17 Barlow and Mariam Holm were the doctors at the clinic. So  
18 like if I tried to run away, the cops would contact Lehi  
19 Barlow, let him know, and he would kind of try to steer my  
20 mind back to doing what I'm told.

21 Q They were part of controlling you?

22 A Yes.

23 Q Did you act out by cutting your hair?

24 A I did.

25 Q What does that mean in the FLDS for a woman to cut her

1 hair, or a girl in your case?

2 A Their beliefs are that your hair is your purity,  
3 basically, and that if you -- like when Jesus comes back,  
4 then the women will wash his feet with their hair. So to  
5 cut your hair at all is like cutting your purity off, so to  
6 speak.

7 Q So why did you cut your hair?

8 A It was one of the biggest things I could think of to  
9 rebel, because I had told my parents so many times I wanted  
10 to leave. And every time I did that there was a consequence  
11 of some kind. And at that point I just didn't care anymore.  
12 I couldn't take it. My hair was down to my knees, and I  
13 just whacked it off, all the way up to my shoulders.

14 I kept trying to run away. I kept going back to my  
15 sister Susie's place. Walking at night. Anything I could  
16 think of that just would make them mad.

17 Q Whatever you could do that you had control over, like  
18 your hair. You had control of your hair?

19 A Yes.

20 Q You were paid at the Hildale clinic, correct?

21 A Yes.

22 Q Were you allowed to keep the money?

23 A No.

24 Q What happened to the money?

25 A I either handed it in at Saturday work meetings, or I

1 handed it in to Warren at church on Sunday.

2 Q Okay. So what's a Saturday work meeting?

3 A They call it the Saturday work projects. It's where  
4 everybody gets to be there on Saturday and -- well, the  
5 whole community works together to build homes, or whatever  
6 project is going on in the community. They work together to  
7 get that done.

8 Q Is that an opportunity for people to give money?

9 A Yes.

10 Q And you turned your checks over?

11 A Yes.

12 Q Either at the work meeting or at Sunday service?

13 A Yes.

14 Q How did you do it on a Sunday, at Sunday services?

15 A Well, everybody goes through the line to shake the  
16 hands of the brethren, and I would just hand my check  
17 directly to Warren.

18 Q There was a wheelbarrel. Wasn't there a wheelbarrel?

19 A Yes.

20 Q How is that part of this, if it was?

21 A They had wheelbarrels up on the stand at the Saturday  
22 work projects. So at the end of the meeting, everybody  
23 would go through, even children, and any change, any money,  
24 anything you have, you put in those wheelbarrels.

25 Q For the prophet?

1 A Yes.

2 Q Did you feel like you had to do that?

3 A Yes.

4 Q Did you want to do that?

5 A No.

6 Q Would there have been serious harm for you if you had  
7 not been at least trying to demonstrate obedience?

8 A Yes.

9 Q How were you able to eventually get out?

10 A I -- after trying to run away so many times and going  
11 over to my sister Susie's house, I finally had found a  
12 connection, because of my sister, and it was a lady that had  
13 married a man from town, but she wasn't from there. And I  
14 knew if I went to her, she would understand that I just  
15 couldn't live that way anymore. So I went to her.

16 Q She was a gentile?

17 A Yes.

18 Q Okay.

19 A And I told her that I wanted out, could she help me,  
20 you know. Because she had resources, would she know how to  
21 do that. She asked me if I was sure. And I said yes. She  
22 said okay. So she took me down to St. George, and we bought  
23 clothes, and she introduced me to other people that could  
24 help.

25 THE COURT: How old were you then?

1 THE WITNESS: Nineteen.

2 BY MR. HOOLE:

3 Q Before you got out, did you work other places beyond  
4 what you've mentioned? You mentioned the clinic and killing  
5 the animals for meat. Did you have other jobs --

6 A Yes.

7 Q -- basically where you provided labor or services for  
8 the benefit of the prophet?

9 A I did.

10 Q And what were those other jobs?

11 A I worked at a gas station with my mom.

12 Q Was that called CJ's?

13 A Yes.

14 Q And that was in Hildale or Colorado City?

15 A Hildale.

16 Q Okay.

17 A And I would go to school, and then I would go help my  
18 mom at CJ's every day.

19 Q What school?

20 A What school? I believe that was the Jeffs Academy at  
21 the time.

22 Q And where was that located?

23 A In Hildale.

24 Q In Hildale.

25 A Yes.



1 Q Okay. Where were you living at the time?

2 A At my father's.

3 Q And where was that, Utah or Hildale?

4 A That was in Colorado City, Arizona.

5 Q So you were crossing state lines to go to work?

6 A Right.

7 Q Did you participate in the annual pecan harvest --

8 A I did.

9 Q -- as a child?

10 A Yes.

11 Q Were you ever paid for any of that?

12 A No.

13 Q Were you required to provide those services?

14 A Yes.

15 Q Again, if you had not done that, would you have  
16 suffered serious harm?

17 A Yes.

18 Q Since leaving the community have you been receiving any  
19 kind of medical care?

20 A Yes.

21 Q Have you been hospitalized?

22 A Yes.

23 Q Do you know how many times?

24 A About eight.

25 Q About eight. Okay.

1           Your allegation here says nine, but you think eight?

2   A     Eight or nine, yeah. Nine would be when they -- when  
3   Dr. Lehi sent me to Flagstaff to a mental institution.

4   Q     And have you received diagnoses?

5   A     Yes.

6   Q     What diagnoses?

7   A     At the time they said I was bipolar, which is not  
8   correct.

9   Q     What is the correct diagnosis, if you know?

10   A    I have severe PTSD, anxiety and depression, which I am  
11   on medications for all of those.

12   Q     Depression and PTSD?

13   A     Yes.

14   Q     Are you able to sleep at night?

15   A     No.

16   Q     Do you have nightmares?

17   A     Yes, I do.

18   Q     What are the nightmares about?

19   A     They are -- have to do with Warren, but it's always a  
20   different scenario, some kind of breakdown, some kind of  
21   entrapment.

22   Q     Loss of control?

23   A     Yes.

24   Q     Are you still receiving care?

25   A     I am.

1 Q And are you still suffering PTSD and depression?

2 A Yes.

3 Q Still having trouble sleeping at night because of  
4 nightmares?

5 A Yes.

6 Q Is this an ongoing thing for you right now?

7 A Very much so.

8 Q Has it ever stopped?

9 A No.

10 Q We have estimated, I think, in our discussions, that  
11 your medical bills would be over 250,000. Do you agree with  
12 that?

13 A Yes.

14 THE COURT: Ms. Jessop, you testified earlier  
15 about being informed of the Sarah higher law. Were you ever  
16 involved in that?

17 THE WITNESS: I was not. Thank goodness. I was  
18 involved in the trainings, but I had -- yeah, I never went  
19 through that.

20 THE COURT: The trainings to perform it?

21 THE WITNESS: Yes.

22 THE COURT: But you never actually did it?

23 THE WITNESS: Correct.

24 THE COURT: How old were you when you were given  
25 that training?

1 THE WITNESS: Sixteen.

2 THE COURT: Right after you were married?

3 THE WITNESS: Yes.

4 MR. HOOLE: Your Honor, I think we can submit the  
5 rest of the damages through an affidavit, if that's okay.

6 THE COURT: Okay.

7 Thank you, Ms. Jessop.

8 MR. HOOLE: That's all we have.

9 THE COURT: Are those all the witnesses you have?

10 MR. HOOLE: That's all the witnesses I have. I'm  
11 prepared to give a closing argument if the Court's ready.

12 THE COURT: That will be fine. How long will it  
13 be?

14 MR. HOOLE: I think I'll be done before 1:30, if  
15 I'm reading the clock right.

16 Can I have just one minute to talk to co-counsel?

17 THE COURT: Yes.

18 MR. HOOLE: Your Honor, the reason I needed to  
19 check on something is because even though the plaintiffs  
20 have individual claims, and we'll submit damages based on  
21 their respective affidavits and their testimony today, they  
22 would prefer opting, if the Court were inclined to award  
23 damages, to ask the Court to do a lump sum of economic, a  
24 lump sum of general, and we'll be asking for punitive  
25 damages. They're a team. They recognize there probably

1 will never be anything collected. But they feel like maybe  
2 a lump sum would send a message that might be heard.

3 THE COURT: I'm willing to have you do that, but I  
4 do need it to be itemized per plaintiff and then simply  
5 added up.

6 MR. HOOLE: Yes.

7 THE COURT: Okay.

8 MR. HOOLE: Yes. We'll do that.

9 THE COURT: All right.

10 MR. HOOLE: So in terms of closing, all these  
11 people were born and raised in the community and they were  
12 in the same boat. And I would submit, Your Honor, that any  
13 of us born and raised in that community would be in the same  
14 boat. So it's difficult to judge or fault anybody.

15 These are good people. The people in the group,  
16 the people who have left the group, they're good people.  
17 They all have sincere religious beliefs -- or did. But at  
18 some point fraud crept in. And that point can be different  
19 for everybody where they recognize it. Or if they don't  
20 recognize it, if it didn't creep in, that's okay, because  
21 that's somebody's individual decisions.

22 About half of the people who were part of the  
23 group are now out, and that number seems to be growing. And  
24 for the people who are in it --

25 THE COURT: Although you have asserted that

1 Helaman Jeffs is trying to reconstitute --

2 MR. HOOLE: And that is giving --

3 THE COURT: -- is that only within the roughly  
4 surviving one-half that that effort is being undertaken or  
5 does that include some type of outreach to others? Do you  
6 know?

7 MR. HOOLE: These are my own estimates based on  
8 what I've heard. But my understanding is about half the  
9 people are clearly out. Of the half that are still in, a  
10 lot of them are probably in a process of leaving. It can  
11 take years. Even after they leave, it can take years before  
12 they, you know, come to a place where they're comfortable  
13 with their thoughts.

14 But the Helaman Jeffs thing has presented what I  
15 think is a problem in the sense that some of the people who  
16 had received no instructions for years and years from Warren  
17 Jeffs now have something to rely on. They have somebody to  
18 fault. They have somebody who can tell them what to do, and  
19 some people need that.

20 So it is reviving, to some extent, some dormant  
21 feelings that have been there, where people have just been  
22 holding on hoping that Warren Jeffs would be released from  
23 prison. So there is that dynamic going on and it's very  
24 hard to know exactly how much of that is happening.

25 I know that there is an effort to bring children

1 back to the priesthood that have been scattered in various  
2 places. And to the extent those children are under the  
3 control of FLDS caretakers, that can happen. This is not  
4 the time or place to talk about some of those events, but  
5 it's really difficult when you have one parent who believes  
6 and one parent doesn't believe, and they have equal rights  
7 to their beliefs, but the one parent sees the other parent  
8 as an apostate with whom we can have no contact.

9 Coparenting in that kind of situation presents enormous  
10 difficulties. It just can't compromise. And that's part of  
11 what's going on.

12 And then there's the belief that children belong  
13 to the priesthood, and it's firmly believed and firmly held.  
14 And so it's the children who are suffering right now for the  
15 most part with that Helaman Jeffs thing. And even before  
16 that, they were separated. That is the dynamic of what is  
17 going on now.

18 So in any event, these are good people. My  
19 clients would argue that fraud crept in at some point. They  
20 recognize that the people in the community would not agree  
21 with that.

22 We are not asking the Court to decide religious  
23 doctrine. The plaintiffs are not even asking this Court to  
24 decide whether Warren Jeffs is a prophet. It's not this  
25 Court to decide if he's the true prophet or a false prophet.

1 I think the people are entitled to their own sincerely held  
2 religious beliefs and disbeliefs. Religious beliefs and  
3 choices are individual matters, and I think that's the line  
4 I want to make clear today. The FLDS and the former FLDS  
5 both have the right to decide what they believe and what  
6 they don't believe.

7 And just as this Court cannot tell the FLDS that  
8 Warren Jeffs is not a prophet, the Court can't tell the  
9 former FLDS to believe that he was. That's the dilemma  
10 we've got in a case like this that's gutting up against  
11 religion.

12 So here, Judge, we have two realities. They're  
13 both entitled to deference. So what do we do? Well, we  
14 have to apply the law to the facts as we know them.

15 In 2016, this lawsuit was initiated against Warren  
16 Jeffs based on what he had admitted in his defaulted  
17 allegations. He admitted the facts that are the backbone of  
18 this case. Those facts have now been supplemented by the  
19 testimony of the plaintiffs and those facts are before the  
20 Court.

21 And I think it's easy to distinguish this case  
22 from perhaps other situations involving religion because we  
23 have a man who has admitted these facts. And part of what  
24 he's admitted is that he is not the prophet, that he never  
25 was the prophet, that he had been immoral with a sister and



1 a brother -- a sister and a daughter, and he hadn't held  
2 priesthood since he was 20. Those are the facts for this  
3 case. Those are not necessarily the facts for the people  
4 who still follow him. They have their own right to reject  
5 all of that. But the Court needs to deal, I believe, with  
6 the facts of this case.

7 Also, religion freedom has limits, and where a  
8 religious leader crosses the line into illegal conduct, the  
9 law needs to be able to respond, and that's this case too.  
10 So this case is really quite distinguishable from other  
11 cases involving religions where the courts don't get  
12 involved. Here the Court needs to get involved not only  
13 because of the facts of the case but because of the laws  
14 that were broken.

15 And there's also another dilemma -- or another  
16 dimension to that, and that is under the Supreme Court law,  
17 minors cannot be made religious martyrs. They can't make a  
18 minor a religious martyr. And that happened to many, many  
19 of these plaintiffs. The Court has acknowledged essentially  
20 that by saying it would consider the evidence in the case in  
21 terms of whether, for purposes of this trial, Warren Jeffs  
22 was or was not a prophet based on his own statements and the  
23 evidence that's been presented.

24 So the elements of fraud, let's just talk about  
25 them for a minute. I'm going to grab that.

1 I know the Court had a memorandum decision which  
2 articulated nine elements, there are nine elements to fraud,  
3 but they've kind of been boiled down in the model jury  
4 instructions that are used in Utah courts. And I think  
5 they're a little bit more understandable, and I would like  
6 to refer to that, if I may.

7 This is 1801, elements of fraud, from the -- I  
8 believe the MUJI instructions, MUJI 2, Model Utah Jury  
9 Instructions. Number one element, the defendant made a  
10 false statement about an important fact. I think all the  
11 clients have testified that he made false statements about  
12 important facts, critical things they needed to know. He  
13 intended that they would rely on his statements. It's clear  
14 from the totality of the circumstances that he intended  
15 that. That they reasonably relied. They reasonably relied  
16 because that's all they knew.

17 I know the reasonableness standard is a reasonable  
18 person standard, but we have to look at this as the isolated  
19 community in which these people lived. And I submit that  
20 the reasonable person born in that community would be in the  
21 same boat. I would be in the same boat as them.

22 I may be working off in Kansas and sending my  
23 money in to the prophet if I had been born and raised there,  
24 without my family. So reasonableness I think needs to be  
25 viewed in context of the totality of the circumstances.

1           As a result, did they suffer damages in reliance  
2 on his statements? And I submit that the damages here,  
3 we've just scratched the surface. I mean we have not gotten  
4 into that in any specificity. As the Court knows, we  
5 haven't been able to be as specific as we wanted. But the  
6 general damages here are enormous. What these people have  
7 been through is enormous.

8           So those are the five elements as articulated in  
9 current Utah law that kind of summarize the nine elements,  
10 and I believe that we have shown the evidence through the  
11 common statement of facts, the specific allegations of the  
12 clients, and their supplemental testimony with respect to  
13 their fraud claims.

14           Some of the clients don't have fraud claims. The  
15 statute of limitations had passed. The remaining clients  
16 had trafficking claims. Let me talk about the elements of  
17 trafficking. Again, this is 18 U.S.C. 1589 as made  
18 actionable in the civil courts through 18 U.S.C. 1595.

19           The elements of trafficking from 1589 -- I'll just  
20 read the statute. Whoever knowingly provides or obtains the  
21 labor or services of a person by any one of, or by any  
22 combination of, the following: Number one, by means of  
23 force, threats of force, physical restraint, or threats of  
24 physical restraint to that person or another person; or by  
25 means of serious harm or threats of serious harm to that

1 person or another person; or by means of the abuse or  
2 threatened abuse of law or legal process; or by means of any  
3 scheme, plan, or pattern intended to cause the person to  
4 believe that, if that person did not perform such labor and  
5 services, that person or another person would suffer serious  
6 harm or physical restraint.

7           Then it defines serious harm. The term serious  
8 harm means any harm, whether physical or psychological,  
9 including psychological, financial, or -- excuse me. It  
10 said any harm, whether physical or nonphysical, including  
11 psychological, financial, or reputational harm, that is  
12 sufficiently serious, under all the surrounding  
13 circumstances, to compel a reasonable person of the same  
14 background and in the same circumstances to perform or to  
15 continue performing labor or services in order to avoid  
16 incurring that harm.

17           That is our case right there. They had no choice.  
18 And I won't detail the evidence about that, but these people  
19 were trafficked for labor. The women, many of them, were  
20 trafficked for sexual purposes all over the country, and  
21 even into Canada and back. I think that we have met those  
22 elements as well.

23           And beyond that, beyond the representations, they  
24 lived in a world of misrepresentation. They did not get the  
25 information they needed to make critical life decisions.

1 They made decisions in the absence of that information,  
2 which was injurious to them. They did so because Warren  
3 Jeffs told them to do it.

4 He's a religious leader, had absolute control over  
5 them, and by taking absolute control over somebody, you owe  
6 them a duty of care. He had an obligation to make sure they  
7 understood what they needed to know. And that's another  
8 reason why this is distinguishable from any other case  
9 involving religious issues, because we don't have situations  
10 where somebody has absolute control over people and makes  
11 their decisions for them.

12 In this kind of a situation, a duty of care  
13 arises. And all they have to do to discharge that duty is  
14 give them the information they need. And people can then  
15 decide what they want, and people can stay involved or they  
16 can get out. Nobody is forcing anybody to make a religious  
17 decision. But they are entitled to knowledge and  
18 information, and they can do with it what they want.

19 As I've tried to explain this to people who can't  
20 believe this happens in the United States, I've used this  
21 analogy and I hope this will help the Court.

22 Imagine being born on an island in the middle of  
23 the ocean and all you know is the island. You can see the  
24 faraway lands across the water, but you're not allowed to go  
25 there. You are taught those people are wicked. You can't

1 trust them. They'll destroy you. You have to stay here and  
2 obey the king. And the king runs his program, and his  
3 program includes absolute control and absolute information.

4 But there's something missing, and that is what  
5 the king won't tell you is he won't let you learn how to  
6 swim. He keeps you dependent on the UEP Trust. He keeps  
7 control over your house. He controls you through your  
8 children. He controls your jobs, whether you have or don't  
9 have sexual relations with your spouse, who you associate  
10 with, what you eat, where you work, what you think. And he  
11 won't let you learn how to swim.

12 These people were not prepared for life. They did  
13 not learn how to swim. That was forbidden. They were kept  
14 on this island and they were taught that the world was evil  
15 and they had to stay there or there would be eternal  
16 consequences. And that may be true, I'm not judging that,  
17 but the point is they weren't taught to swim and they didn't  
18 have ability to make their own choices. And as a result,  
19 they only left the island when it was so bad that they  
20 risked drowning.

21 And I submit, Your Honor, that many of them have  
22 drowned in some ways and they're really struggling. They're  
23 really struggling. And these are just 15 or so of the  
24 thousands of people raised on that island.

25 Marvin Jeffs said something in his -- excuse me,

1 Marvin Cooke said something in his personal allegations  
2 which I thought I would just read very briefly, if I can  
3 find it. His last allegation. I apologize.

4 THE COURT: It's all right. Take your time.

5 MR. HOOLE: It's in our trial brief, pages 31  
6 through 32. Actually it's Exhibit B to the trial brief, 31  
7 through 32. And I just thought it was -- it's paragraph  
8 131. All that was required was absolute obedience to the  
9 prophet, who controlled their food, clothing, shelter,  
10 medical care, families, marriages, sexual relations,  
11 communications, and access to information. That's all that  
12 was required. That's what you had to do to be obedient, and  
13 these people tried. And Warren Jeffs took advantage of  
14 their sincere religious beliefs and basically destroyed  
15 them.

16 The discussion was made -- a comparison between  
17 the 1953 raid, which just terrorizes these people, and that  
18 external threat to them compared to the internal threat that  
19 they've suffered and the damages that they've suffered since  
20 1998. And the thousands of families -- maybe hundreds of  
21 families that have been split up, divided, destroyed,  
22 remarried, adopted, remarried, readopted, kicked out, sent  
23 away, all without the judicial process that is afforded to  
24 children, and that controls the institution of marriage.  
25 And it has destroyed these people.

1           I don't know what will happen in the future. It  
2 is truly a human catastrophe. Whole generations have been  
3 raised without the ability to function normally, go to  
4 school, even marry. The damage, as indicated by my clients,  
5 is enormous.

6           So we will submit, Your Honor, individual damages  
7 for the Court's consideration. And if the Court asks me to,  
8 I will prepare proposed findings and conclusions, and I'll  
9 leave blanks for the Court to insert what the damages would  
10 be if the Court awards damages.

11           I really struggle with damages here because it's  
12 so difficult to put a number on this. You know, I'm  
13 assuming -- and we haven't done more than just a quick  
14 summary, but it's sort of the back of an envelope  
15 calculation. Assuming that the economic damages are ten  
16 million among all the plaintiffs, assuming they're ten  
17 million, what would their general damages be? I couldn't  
18 sleep last night. I was thinking about this and I thought  
19 ten times economic damages, is that too low? Is that too  
20 high? I don't know. But it seems to me in many ways not to  
21 even begin to address the problem.

22           I really believe that the Court should use this  
23 opportunity to award generous general damages, knowing that  
24 they won't be collected. But we need to send a message, and  
25 particularly in terms of punitive damages. We need to send



1 a message. The FLDS people aren't here. They're not going  
2 to read the transcript. I'm going to order the transcript,  
3 but they're not going to read it. But they will hear,  
4 through their little sources, they will hear the amount of  
5 the damages. And if it's significant enough, it's going to  
6 be one more little piece in that puzzle to help them  
7 recognize the picture so that they have enough information  
8 to make informed religious decisions. And whatever they  
9 decide is fine. But they're entitled to that information,  
10 Your Honor.

11 So I would submit that this is an appropriate  
12 time, if the Court rules for the plaintiffs and awards  
13 damages, to help them send that message. Thank you.

14 THE COURT: Two things, Mr. Hoole. First of all,  
15 I would request that in your proposed findings of fact and  
16 conclusions of law that you not leave any blanks, that you  
17 in fact give the Court your estimate based upon the evidence  
18 that you are able to present in those findings of fact to  
19 justify whatever damages you suggest, okay?

20 MR. HOOLE: Even a lump sum?

21 THE COURT: Yes.

22 MR. HOOLE: Okay.

23 THE COURT: Secondly, and I think you have  
24 already -- you know this. This threat of eternal damnation  
25 probably ought not to be mentioned in the findings of fact

1 and conclusions of law. I fear that will cross that line  
2 that you know I can't, and you have been very good not to.  
3 But out of abundance of caution, let's not have that part of  
4 the --

5 MR. HOOLE: I recognize that the Court has  
6 disregarded that kind of thing as it's heard the evidence,  
7 and I will make sure those kinds of things are omitted from  
8 any findings of fact.

9 THE COURT: I don't think it would be necessary  
10 for you to include them for you to prevail in this matter,  
11 all right?

12 Thank you, Mr. Hoole. I think you have done an  
13 excellent job with a difficult case. Frankly, I think you  
14 would have -- well, maybe the word is enjoyed. I don't  
15 know. If there had been a representation on the other side,  
16 this would have been easier for you, I do believe. But  
17 you've done an excellent job under the circumstances, and I  
18 congratulate you for it.

19 MR. HOOLE: Thank you, Your Honor, and thank you  
20 for the opportunity to present the case.

21 THE COURT: We'll be in recess.

22 Mr. Hoole, how long will you need for your  
23 proposal?

24 MR. HOOLE: Well, I would like to request the  
25 transcript, and I don't know how long that will take. I've

1 got pretty heavy schedules, and I would like to go through  
2 it and do a good job. So if I could have 60 days.

3 THE COURT: Sixty days. Thank you.

4 (Whereupon, the proceeding was concluded.)  
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C E R T I F I C A T E

I hereby certify that the foregoing matter is  
transcribed from the stenographic notes taken by me and is a  
true and accurate transcription of the same.

PATTI WALKER, CSR-RPR-CP                      DATED: 10-20-2022  
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